

Government of the People's Republic of Bangladesh

GAP and SEA/SH prevention Plan

FOR

**Additional Financing for Emergency Multi-Sector Rohingya
Crisis Response Project (EMCRP)**

Project ID no: EMCRP/AF/GS/S8

**Local Government Engineering Department (LGED)
Ministry of Local Government, Rural development & Cooperatives**

www.lged.gov.bd

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Abbreviations

AF	Additional Financing
CERE	Contingent Emergency Response Component
CiC	Camp-In-Charge
CXB	Cox'sBazar
DEVAW	United Nations Declaration on the Elimination of Violence against Women
DPHE	Department of Public Health Engineering
DRP	Displaced Rohingya Population
DV	Domestic Violence
EMCRP	Emergency Multi-Sector Rohingya Crisis Response Project
FLFP	Female labor force participation
EoC	Emergency Operation Center
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FDMN	Forcibly Displaced Myanmar Nationals
FLFP	Bangladesh's female labor force participation
FSCD	Fire Service and Civil Defense.
FSV	Family and Sexual Violence
FSW	Female Sex Worker
GBV	Gender-based Violence
GBVH	Gender-Based Violence and Harassment
GCT	GBV Complaints Team
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
IA	Implementing Agency
IPV	Intimate Partner Violence
LGED	Local Government Engineering Department
M&E	Monitoring and Evaluation
MODMR	Ministry of Disaster Management and Relief
MoPME	Ministry of Primary and Mass Education
MSPVAW	Multi-Sectoral Programme on Violence Against Women
NCB	National Competitive Bidding
NGO	Nongovernmental Organization
NWDP	National Women Development policy
OCC	One Stop Crisis Center
OHS	Occupational Health and Safety
PCN	Project Concept Note
PMU	Project Management Unit
RRRC	Refugee Relief and Repatriation Commissioner
SBD	Standard Bidding Document
SEA	Sexual exploitation and abuse
SH	Sexual harassment
SEP	Stakeholder Engagement Plan
SIRT	Safeguards Incident Response Toolkit
STI	Sexually Transmitted Infection
TOR	Terms of Reference
UN	United Nations
UNICEF	United Nations International Children's Fund
VAC	Violence Against Children
VAW	Violence against women (VAW) i
VAWG	Violence Against Women and Girls
WHO	World Health Organization

1. Introduction:

Bangladesh is one of the most disaster-prone and climate –vulnerable countries in the world. Consequently, social vulnerable to disasters and climate change is also high. The country faces considerable development challenge posed by its low and flat topography and vulnerability to floods, torrential rains, erosion, storms and tidal surges due to severe cyclones and landslides. Its vulnerability is exacerbated by climate change induced increase in frequency and intensity of extreme weather events, and sea-level rise. Damages and losses associated with a single extreme event impose substantial costs on the national economy.

Cox's bazar lies in the geographically, climatic and socially vulnerable areas in the country. The population in Cox's Bazar is young and poorly educated and is hosting a displaced population that is overall younger and less educated than the location population. Forty percent of the district's population is below the age of 15, compared to 32 percent at the national level. While the employment rate in the host/local community is high (mostly engaged in agriculture). Nearly half of all host community households use shared water and sanitation facilities.

The Government of Bangladesh requested the World Bank to provide support to address the situation in the Cox's Bazar district as a result of the Rohingya crisis which began in August 2017. The Bank has responded to the Government and indicated support, including the Additional Financing of EMCRP. The parent project targeted preferably the DRPs. The AF will broaden the scope and also address the needs of the host community. The proposed AF will support scaled-up activities for the host communities and the DRPs, especially in terms of physical infrastructure to enhance resilience to extreme climate events and access to energy, water and sanitation.

2. Objectives of the Project:

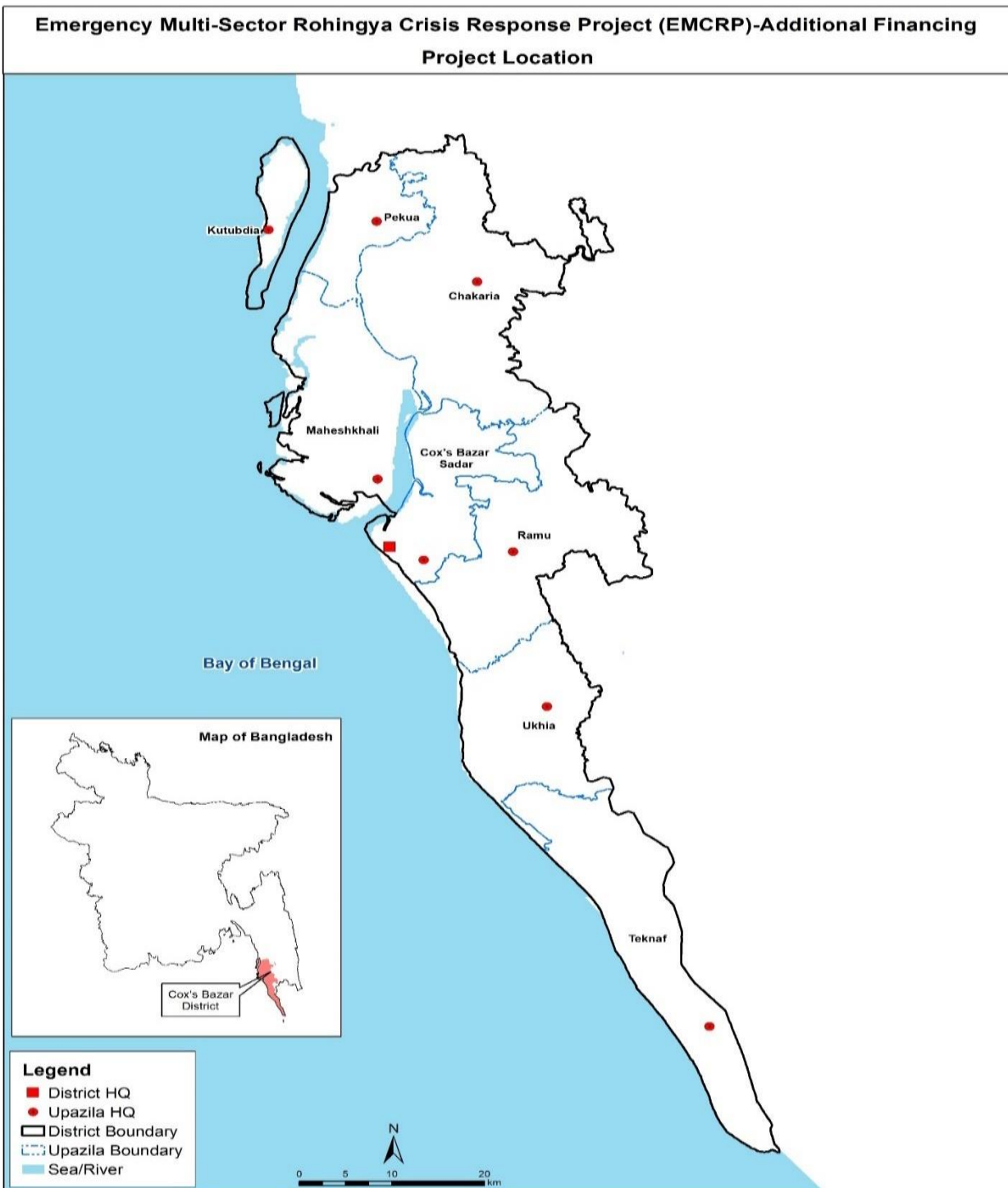
The objective of the project is to provide greater protection including improved facilities for the displaced people and host communities through:

- Reducing the vulnerability to natural disasters;
- Improving social service delivery system;
- Improving water and sanitation facilities;
- Reducing vulnerability to accidental fire;
- Provision to better educational facilities;
- Strengthening and scaling up Gender Based Violence (GBV) prevention and response services to the people

3. Project Location:

The Project location is widely distributed across the upazilas- Sadar upazila, Ramu, Chokoria, Pekua, Moheshkhali, Kutubdia, Ukhiya and Teknaf under the Cox's Bazar district.

4. Map of Project Location



5. LGED project activities under the EMCRP-AF project:

The Project is located in the 8 upazilas under the Cox's Bazar district. The main infrastructure of the EMCRP AF project activities are as follows: -

- Improvement of roads: 19.47 km
- Additional new disaster shelter construction: 27 nos.
- Widening and strengthening of roads: 25 km
- Training facility construction with ICT for LGED
- Forestation by BFD
- Solar PV nano grid: 100 nos.
- Additional solar street light: 2500 nos.
- Additional lightening protection system: 600 nos.
- Rubber dam: 2 nos.
- Jetty Improvement: 3 nos.
- Improvement of existing Fire Service Offices
- FSCD building Construction: 1 no.
- Emergency operations center for FSCD
- Additional firefighting equipment for FSCD
- LGED training for local construction workers

6. Female Labor Force Participation in Bangladesh

Bangladesh's female labor force participation (FLFP) has risen substantially in recent years, from 26 percent in 2002 to 35.6 percent in 2016; yet, FLFP and quality of jobs for females are still lagging.

This gender disparity can be attributed to structural barriers including women's domestic burden, sex segregation in educational subject and occupation, employer discrimination, restricted mobility, limited access to trainings, lack of female friendly facilities, sexual harassment at work, limited childcare provisions and so on. Social norms that influence and limit women's choices as well as a lack of a supportive policy environment also stunts FLFP. Moreover, female employment tends to be more concentrated in low-paid and low-productivity occupations, which are more vulnerable to technology innovation and automation in the production process. Increasing women's labor force participation and improving the quality of female employment will require more significant support for women's access to employment opportunities and high-quality skills development programs.

7. The World Bank Gender Policy

The World Bank aims to reduce gender disparities and enhance women's participation in the economic development of client countries by integrating gender considerations in its country assistance program. To this end, the Bank assists its client countries to:

(a) Design gender-sensitive policies and programs to ensure that overall development efforts are directed to attain impacts that are equitably beneficial for both men and women. The Bank helps

governments (i) identify barriers—including men’s attitudes that prevent women from participating in and benefiting from public policies and programs, (ii) assess the costs and benefits of specific actions to remove these barriers, (iii) ensure effective program delivery, and (iv) establish monitoring and evaluation mechanisms to measure progress.

(b) Review and modify legal and regulatory frameworks to improve women’s access to assets and services, and take institutional measures to ensure that legal changes are implemented in actual practice, with due regard to cultural sensitivity.

(c) Strengthen the database for, and train country officials in, gender analysis, particularly in countries with inadequate gender-disaggregated data.

8. Legal and Institutional Environment for Gender Equality and GBV Prevention in Bangladesh

Existence of laws and regulations as well as mechanisms helps to address SEA/SH risks. Bangladesh has the following mechanisms for SEA/SH/GBV/VAC mitigation, prevention and response.

- The National Women’s Development Policy (NWDP), 2011 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.
- The Multi-Sectoral Program on Violence against Women (MSPVAW) is being implemented jointly by the Government of Bangladesh and Government of Denmark under the Ministry of Women and Children Affairs. 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. One of the significant components of the program is the OCC 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. A training module for combating VAW was developed for OCC staffs, teacher, students, health assistant, family planning officers and other professions. Another intervention set up by the MSPVAW is the National Helpline Center for violence against women, a 24-hour helpline that can be accessed from land lines and mobile numbers.
- A High Court decision declared in 2009 that the sexual harassment of girls and women is illegal, and issued a set of guidelines defining sexual delinquency to prevent any kind of physical, mental or sexual harassment of women, girls and children at their workplaces, educational institutions and other public places including roads across the country.

Bangladesh’s laws do address the use of corporal punishment in school settings; and in 2010 the Ministry of Education released an Education Circular that forbids corporal punishment in classrooms and schools. This same ban does not, however, extend to alternative care institutions, penitentiary settings or as punishment for specific criminal offenses.

- Other than NWDP, the government has enacted a number of stringent laws and policies to protect men and especially women from gender based violence (GBV) including sexual exploitation and abuse/sexual harassment (SEA/SH): 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 Labor 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. Multi-Sectoral Program on Violence against Women is being implemented jointly by the Government of Bangladesh and Government of Denmark under the Ministry of Women and Children Affairs. One of the significant components of the program is the OCC (One Stop Crisis Centre) in the Medical College Hospitals (MCHs). The OCCs provide health care, police assistance, DNA test, social services, legal assistance, psychological counseling and shelter service etc.

9. Overall condition of the Cox's bazar in terms of gender and SEA/SH

Cox's Bazar is the tourist capital of Bangladesh. Every year a large number of tourists from home and abroad come to visit this beach and enjoy the associated facilities.

Since August 25, 2017, extreme violence in Rakhine State, Myanmar, has driven an estimated 727,000 people from the Rohingya community across the border into the Cox's Bazar District of Bangladesh. This exodus brings the total number of Displaced Rohingya Population (DRP) in the district to about 919,000 in what is one of the fastest developing forced displacement crises in the world. 85% of the DRP are living in collective sites, 13% in collective sites with host communities, and 2% in dispersed sites in host communities. In Ukhia and Teknaf, the two Upazilas where most of the DRP have settled, they outnumber the host community by over a factor of two.

They face risks and incidents of forced marriage, sexual exploitation and abuse, trafficking, and domestic violence from FDMN/DRP and host communities. Women and girls who are facing constant threats and GBV incidents.

For contractors, practical entry points include the procurement process (bid documents, evaluation criteria and sharing policies/procedures), contract selection and negotiation, regular engagement, as well as a clear plan for how sub-contractors will be managed. For suppliers, companies can encourage and support their alignment with GBVH risk management practices, agree acceptable codes of conduct, raise awareness about policies and procedures, and include suppliers in any relevant training.

Major civil works can be associated with an increase in GBV risks. The Forms of GBVH with example are as follows:

Forms of GBVH			
Sexual exploitation where people abuse their positions of relative power or trust of exploit someone through sexual relationships.	Sexual Abuse as a result of force or unequal power, for example through sexual assault, rape, attempted rape of forcing someone to perform oral sex. All sexual activity with children is sexual abuse.	Sexual Harassment through unwanted sexual advances, requests for sexual favours or touching or behaving in a way which creates a humiliating or offensive environment	Non-sexual forms of GBVH using threatening, bullying, violent or harassing behaviors. This can include punching, kicking and shouting as well as denial of resources and psychological abuse.

10. GAP and SEA/SH prevention Plan

LGED has proposed a GAP and SEA/SH for the EMCRP AF in conformity with its own Gender Equality Strategy and the World Bank requirements of gender equality in development process. The GBV Prevention Plan takes a comprehensive approach to include both prevention and mitigation measures as the existing policies and measures on mitigation are limited to address GBV. The proposed project involves construction work in the project implemented areas which may have the potential GBV risks in Cox's Bazar district areas: sexual exploitation and abuse, workplace sexual harassment, and non-sexual exploitation and abuse.

The project will include a general **Code of Conduct (CoC)** as well as a Labor Code of Conduct, covering the GBV/SEA/SH related risks for the contractors, sub-contractors, and laborers who will be employed under the project. The GAP and SEA/SH prevention Plan will have the main target to correctly and in a gender sensitive way implement the project activities of EMCRP AF and to achieve optimum success in this regard.

Objective of GAP and SEA/SH prevention Plan:

The overall objective is to ensure a gender equal society in which women and men enjoy the same opportunities, rights and obligations in all spheres of life, at least throughout the project working environment, which is expected to be spelled out within the personal sphere of individuals who are engaged in the project.

To set forth the expectations of conduct and mutual respect in regard to sexual harassment and the process of complaint if these expectations are not met or violated.

The Gender Action plan (GAP) and sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) prevention Plan outlines how to minimize the risk of GAP and sexual harassment in the project, as well as to address any GBV issues that may arise.

The prevention Plan needs to include specific arrangements for the project by which SEA/SH risks will be addressed. This includes considerations such as:

- ❖ Awareness raising strategy, which describes how Implementing agency, contractors, workers and local communities will be sensitized to SEA/SH risks, and the worker's responsibilities under the CoC;

- ❖ How the project will provide information to employees and the community on how to report cases of SEA/SH, in violation of the CoC, to the Grievance Mechanism (GM).
- ❖ The GM process for notifying the contractor of allegations and
- ❖ GBV service providers to which GBV survivors, including SEA/SH survivors, will be referred, and the services which will be available.

GAP and SEA/SH prevention Plan			
Activities	Target Activities and Indicators	Responsibilities	Timeline
Bidding documents	<ul style="list-style-type: none"> Based on the project's needs, define the requirements to be included in the bidding documents which address GBV & gender issues 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	Tender Invitation time
Recruitment of Gender/ GBV Specialist to support project implementation	<ul style="list-style-type: none"> Appoint a Gender/GBV Specialist. 	PIU, LGED	Starting time of the project
Physical design	<p>In case of disaster shelters/MPSC, ensuring:</p> <ul style="list-style-type: none"> Separate toilets for female and male. Room for lactating mothers and pregnant women's Ensure water facility First Aid Ramp for elderly, disabled and pregnant women/ persons. Provide lighting around project sites, including latrines and access routes. The location of the shelters must be in close proximity to the vulnerable communities with well road connectivity <ul style="list-style-type: none"> In case of access road/ other road sub-projects, solar powered lighting facilities along the road length. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	September , 2023
Ensure GBV free women's participation as unskilled labour for civil works	<p>Ensure equal pay for equal work for men and women</p> <p>Install separate latrines for female construction workers.</p> <p>Ensure women friendly work environment;</p> <p>Ensure drinking water and First Aid facilities for the construction workers.</p> <p>The contractors should not deploy any child labour in their site.</p>	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	September ,2023
Improve safety of project – related reduce GBV risks civil works for labour to during construction works.	<p>Improve lighting around project area</p> <p>Work place safety for women and children</p> <p>Initiate and strengthen active GRM for the entire project, as well as for the workers.</p>	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	September ,2023

Sensitization of IA and Contractors addressing GBV/SEA/SH risk on project and the mechanism of implementation	<ul style="list-style-type: none"> ■ Sensitization of IA and Contractors in addressing GBV/SEA/SH risk on project and the mechanism of implementation, through briefing or workshops (online/ offline). ■ Consultation with LGED field office. ■ Further activities on community sensitization is provided in the Training and awareness raising section. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	September ,2023
Identification of GBV service providers	<ul style="list-style-type: none"> ■ Identify relevant local level actors/potential partners in addressing GBV/SEA, women's groups, INGOs, UN agencies on GBV ■ As part of the implementation arrangement under the project UNFPA has been delegated responsibilities with different measure for preventing the GAP and SEA/SH prevention. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023
Establish and strengthen an effective GRM that can respond to GBV/SEA/SH cases based on the existing framework.	Formation of a GRC committee for GBV grievance. 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. Visibly display of signage on GBV prevention and zero tolerance against GBV at all strategic location/ hotspots;	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023
Awareness raising on GBV in the community.	Promote awareness of the heightened risk of GBV during disasters, through leaflets, posters, briefing sessions, etc. Ensure consultation with women, men, girls and boys	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	September ,2023
Conduct Focus group discussion (FGD) on SEA/SH in the communities around the project/sub project sites.	<ul style="list-style-type: none"> ■ Conduct FGD on Gender Based Violence (GBV) in the project areas; 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	September ,2023
Ensure training on GBV and GRC rules & responsibilities to GRC committee.	<ul style="list-style-type: none"> ■ Preparation of manual on GAP and SEA/SH/GBVH training; ■ Provide training to GRC committee on GBV/SEA/SH and GRC rules & responsibilities. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023
Codes of Conduct (CoC) signed and understood by all those engaged in the project.	<ul style="list-style-type: none"> ■ Ensure contracts including clauses on GBVH ■ Workers must sign a Codes of Conduct (in Bangla), they are to get familiar with all the clauses in the CoC. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023

11. Training and awareness raising

Training and awareness raising is a strong step toward behavior change. As projects are implemented, training on SEA/SH should be made available to the communities adjoining the project so they can learn about the roles and responsibilities of actors involved in the project, processes for reporting allegations of SEA/SH, and the corresponding accountability structures. Training of both the communities adjoining the project and project implementers allows all stakeholders to understand the risks of SEA/SH, as well as appropriate mitigation and response measures.

GBV response and prevention is not well integrated in government structure in Bangladesh. 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.

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 as well as GBV prevention and response activities. To prevent the GBV in the project areas need to require aware as per community action plan. These are as follows:

Community Awareness Plan			
Activities	Indicators	Responsibilities	Timeli ne
Sensitization for addressing SEA/SH risk and reduce GBV risks of civil works for labour during construction works.	<ul style="list-style-type: none"> ■ Sensitization of Contractors/workers in addressing SEA/SH risk on project. ■ Consultation with LGED field office. ■ Improve lighting around the project area of the work place safety for women and children. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023
Strengthening of GRM to GBV/SEA/SH on the existing framework.	<ul style="list-style-type: none"> ■ Formation of a GRCs for GBV grievance. ■ Distribution of leaflets on GBV prevention in the project areas. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023
Awareness raising on GBV in the community.	<ul style="list-style-type: none"> ■ Ensure consultation with women, men, girls and boys. 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023
Conduct FGD on SEA/SH in the workers/project areas.	<ul style="list-style-type: none"> ■ Conduct FGD on Gender Based Violence (GBV) in the workers/ project areas; 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023
Codes of Conduct (CoC) signed in the project employees.	<ul style="list-style-type: none"> ■ Workers must sign a Codes of Conduct (in Bangla). 	Social Specialist (D & Sc), Gender/GBV Specialist (PIU)	June, 2023

The prevalence of GBV in the project sites is different from the overall country situation. Rohingya people and host communities' large number of people lives here at small place. GBV in the form of sexual harassment is the most pervasive form of human rights violation.

The risk of child marriage is influenced by certain background characteristics like residing in rural areas and to live in poorer households especially in Rohingya people.

Community sensitization: Workers must sign a code of conduct (In Bangla). To ensure the community awareness consultation with women, men, girls and boys will be made. Also FGD on SEA/SH will be made in the workers /project areas. Formation of GRCs for GBV grievance will be made. Also Training to GRC committee on GBV/SEA/SH and GRC rules & responsibilities will be provided. Leaflet/ community materials will be provided and distributed among the target people. Progress in target activities will be monitored, and communicated through periodic reports (e.g., part of safeguards reports in quarterly submission) to be prepared by the D&Sc and reviewed and forwarded to World Bank by the PIU.

12. Grievance Redress Mechanism (GRM)

Project-specific grievance redress mechanism (GRM) will be established in PMU to receive, evaluate, and facilitate the resolution of affected person's concerns, complaints, and grievances about the social and environmental performance at the level of the project.

Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons resorting to expensive, time-consuming legal actions. The mechanism will, however, not bar an aggrieved person to go to the courts of law. LGED, with past experiences of working with the Bank, has developed an effective GM that is working well in the ongoing projects. This GRM will also address issues of GBV/SEA/SH, SEC complaints and any land issues.

Grievance Redress Procedures

All complaints and suggestions will be received formally in the LGED Upazila office by the GRC Member Secretary. The complaints will largely be channeled through the GRC focal points but aggrieved persons can also lodge the complaints and produce suggestions directly to the Upazila Engineer. Complaints may also be received directly at the Executive engineer office at the district level. An intake register will be maintained at the Upazila LGED Office (office of the member secretary). The UE will be assisted by his Community Organizer in recording the details of the grievances in the intake register for documentation and ensure impartiality, fairness and transparency. The intake registration will have data/information columns including (i) Case no., (ii) date of receipt, (iii) name/type of complaint/grievance, (iv) sex, (v) father's name/husband's name, (vi) complete address of the person raises the complaint/grievance, (vii) main objection (loss of land/property or entitlement), (viii) detailed complaint story, (ix) expectation with documentary evidence and previous records of similar grievances will be documented in the intake register.

No GRC members can be contacted by the aggrieved persons in advance. Rather, the concerned persons are informed to attend formal hearings at an appointed date. The GRC committee will site for hearing at the District LGED office. The GRC will record salient points to be presented by the aggrieved person and will examine their documentary evidences to be submitted during informal hearings. A resolution register will be maintained at the GRC secretariat.

Based on consensus, the procedure will help to resolve issues/conflicts amicably and quickly, saving the aggrieved persons from having to resort to expensive, time consuming legal action.

GBV Action Plan to mitigate SEA/SH:

GBV concept is new in Bangladesh. The GBV 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.

Formal organizations such as NGOs, police, OCC, multi-sectorial project of government working to respond GBV. GBV survivors including SEA/SH survivors will be referred to the selected service providers to avail the services, in case of need.

PIU will set up the GRM based on local resources and mechanism on GRM response. SEA/SH allegations can be reported, just like any other project –related grievance, using a regular project – SEA/SH incident reporting. PIU should arrange a training and the supervision consultants and contractors will be included in these trainings. 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. It is worth mentioned that member secretary of the respective GRC/ Focal person will have responsibility to record/register project related all GBV/SEA/SH grievances and also bring those issues under cognizance of the concern authority for mitigation. Then as per project needs to coordinate with PSEA network in Cox's Bazar for their information and assistance.

13. Identification of GBV service providers:

The project sites are mostly located in rural and hard to reach areas. 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-sectorial 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 is attached. 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 the attachment 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. This desk is managed mostly by the women officers who are trained to handle cases of GBV. In addition Ministry of women and children affairs also introduces nation-wide helpline (109).

List of GBV service provider in project area	
a. Helplines	b. Immediate rescue information
<ul style="list-style-type: none"> National Helpline Centre for Violence against Women and Children: 10921; Legal Aid Helpline: 16430 Marie Stopes Bangladesh: 08000222333; Acid Survivors Foundation (ASF): +8801713010461; Bangladesh Legal Aid and Services Trust (BLAST): +8801715220 220; Ain o Salish Kendra (ASK): +8801724415677; Nation-wide helpline – 999; 	<ul style="list-style-type: none"> OCC (Medical): 109 OCC(Judicial) a. Chittagong: +8801819941106;
c. Psycho-social counseling	d. Shelters
<ul style="list-style-type: none"> Marie Stopes Bangladesh: 02-58152538; Acid Survivors Foundation (ASF): +8801713010461; Ministry of Women and Children Affairs (focused on COVID19 Psychosocial Counselling): National: <p style="text-align: center;">12.00-3.00:+8801715297944, 3:00-6.00: +8801727209070 6.00-9.00:+8801914317856</p> <p>Regional</p> <p>9.00-12.00:</p> <ul style="list-style-type: none"> Dhaka, Dhaka Medical College Hospital (DMCH): +8801780839944, Chattogram, Chattogram Medical College and Hospital (CMCH): +8801676095159, <p>3.00-6.00:</p> <ul style="list-style-type: none"> Dhaka, Dhaka Medical College and Hospital (DMCH): +8801675620992, Cox's Bazar Medical College and Hospital (CoxMCH): +8801847461880 Chattogram, Chattogram Medical College and Hospital (CMCH):+8801761362020, 	<ul style="list-style-type: none"> Judicial OCC Chittagong: +8801819941106; <p>Dhaka Ahsania Mission (shelter with transport) (880-2) 58155869, 9127943, 9123402, 9123420;</p>
	e. Legal Counseling
	<ul style="list-style-type: none"> eBangladesh Legal Aid and Services Trust (BLAST): +8801715-220 220; Ain o Salish Kendra (ASK): +8801714-025069; Organization for Women's Development in Bangladesh (OWDEB) – Chittagong (Providing service to Ward 4,5,6 now): +8801711 – 171060

14. Budget for prevention Plan

A tentative budget target to implementing this prevention plan for the entire duration of the project has been included below. This budget will be annually reviewed by PD; if found necessary, will be revised and adjusted. The budget is provided at Table below:

Table: Tentative budget for implementation of GAP and SEA/SH prevention Plan

Sl. no	Stakeholder Engagement Activities	Quantity	Unit Cost (Taka)	Total Cost (BDT)
1	Awareness raising on GBV in the community.	8	1,000	8,000
	Leaflets /Poster	LS	15,000	15,000
2	Conduct Focus group discussion (FGD) on SEA/SH in the communities around the project/sub project sites.	8	1,000	8,000
3	Sensitization of IA addressing GBV/SEA/SH risk on project at Field level.	8	1,000	8,000
4	Ensure training on GBV and GRC rules & responsibilities to GRC committee.	8	75,000	600,000
5	GRM Register /Guidebook (per site 1 no)	8	150	1200
6	Suggestions Box (Each upazila & zila)	9	1,500	13,500
7	Recruitment of Gender/ GBV Specialist to support project implementation	1	As per DPP	

8	Contingency (2%)		653,700	13,074
			Total	666,774

15. Conclusion:

The sexual violence poses an obstacle for smooth implementation of the project, it also key barrier to bring peace and security in work places. High level of performance from the workforces heavily depends on gender friendly working environment prevailing at the work places and active engagement of women in project implementation. Many women faces different sorts of gender based violence along with undesirable difficulties at the workplaces such as; physical assault, mental and emotional torture, rape etc. that forced women to leave the workplaces with painful experience. The LGED is highly concerned about the issues as many women take part in different phases of its project, therefore, an outline regarding GAP/SEA/SH is very much required to mitigate above problems on planned way. This plan will create such an environment that would be absolutely gender friendly where female workers could able to work in pleasant environment and also give their cent percent of effort to complete the project within the deadline.

Annex – I: Understanding Gender-Based Violence and Sexual Exploitation and Abuse

Violence against women and girls (VAWG)	<p>The 1993 UN <i>Declaration on the Elimination of Violence against Women</i> defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life (Article 1).</p> <p>Violence against women and girls shall be understood to encompass, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation; • Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced sex work; • Physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs (Article 2). <p>Violence against women and girls is a manifestation of historically unequal power relations between men and women, which have led to domination over and discrimination against women by men and to the prevention of the full advancement of women.</p>
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Gender-based violence (GBV)	<p>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 (IASC 2015). Women and girls are disproportionately affected by GBV across the globe.</p> <p style="text-align: center;">Gender-based violence (GBV)</p> <div style="text-align: center;"> <p>The diagram illustrates the components of Gender-Based Violence (GBV) as a sum of three factors: Gender Discrimination, Abuse of Power, and Lack of Respect for Human Rights, which together result in GBV.</p> </div>
Sexual harassment (SH)	Unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the 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 the procedures to report each. Both women and men can experience SH.
Sexual exploitation	A person abusing their position of relative power or trust to exploit someone through sexual relationships.
Sexual abuse	A person using force or unequal power, for example through sexual assault, rape, attempted rape or forcing someone to perform oral sex. All sexual activity with children is sexual abuse
Sex	Biologically stated differences between being male and female.
Child marriage	Child marriage refers to any formal marriage or informal union between a child under the age of 18 and an adult or another child (UNICEF).
Human Trafficking	Trafficking in persons is defined as the recruitment, transportation, transfer, harboring or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Women and children are particularly vulnerable to trafficking practices (Environmental and Social Standard (ESS)).
Child Sexual Abuse	Child Sexual Abuse is defined according to the age of the victim. It includes different forms of sexual violence, involves explicit force or coercion or cases in which the victim cannot consent because of his or her age (GBV IMS Classification Tool). The UN considers all sexual activity with someone younger than 18 to be sexual abuse (United Nations 2016).
Domestic Violence	Any violence between family members and/or current/former intimate partners.

Annex – II: Sample Code of Conduct (CoC) covering the GBV/SEA/SHA/SH related risks.

Introduction

The company is committed to ensuring a work environment which minimizes any negative impacts on the local environment, communities, and its workers. The company also strongly commits to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate, or representative of the company. The purpose of this *Code of Conduct* is to:

1. Create a common understanding of what constitutes Sexual exploitation and abuse, and sexual harassment
2. Create a shared commitment to standard behaviors and guidelines for company employees to prevent, report, and respond to SEA and SH, and
3. Create understanding that breach of this code of conduct will result in disciplinary action.

Definitions

Sexual Exploitation: A person abusing their position of relative power or trust to exploit someone through sexual relationships.

Sexual Abuse: A person using force or unequal power, for example through sexual assault, rape, attempted rape or forcing someone to perform oral sex. All sexual activity with children is sexual abuse

Sexual Harassment:

Unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.

Sexual Harassment versus SEA:

SEA occurs against a beneficiary or member of the community. Sexual harassment occurs between personnel/staff of an organization or company and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that agency policies and staff trainings can include specific instruction on the procedures to report each.

Consent is the choice behind a person's voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent. **Under this Code of Conduct consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.**

While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual harassment which constitute gross misconduct, are grounds for termination or other consequences related to employment and employment status:

(1) **Examples of sexual exploitation and abuse** include, but are not limited to:

- A project worker tells women in the community that he can get them jobs related to the work site (cooking and cleaning) in exchange for sex.
- A worker that is connecting electricity input to households says that he can connect women headed households to the grid in exchange for sex.
- A project worker gets drunk after being paid and rapes a local woman.
- A project worker denies passage of a woman through the site that he is working on unless she performs a sexual favor.
- A manager tells a woman applying for a job that he will only hire her if she has sex with him.
- A worker begins a friendship with a 17-year-old girl who walks to and from school on the road where project related work is taking place. He gives her rides to school. He tells her that he loves her. They have sex.

(2) **Examples of sexual harassment in a work context** include, but are not limited to:

- Male staff comment on female staffs' appearances (both positive and negative) and sexual desirability.
- When a female staff member complains about comments male staff are making about her appearance, they say she is "asking for it" because of how she dresses.
- A male manager touches a female staff members' buttocks when he passes her at work. A male staff member tells a female staff member he will get her a raise if she sends him naked photographs of herself.

Individual signed commitment (to be translated in a language understood by the person signing):

I, _____, acknowledge that sexual exploitation and abuse (SEA) and sexual harassment, are prohibited. As an (*employee/contractor*) of (*contracted agency / sub-contracted agency*) in (*country*), I acknowledge that SEA and SH activities on the work site, the work site surroundings, at workers' camps, or the surrounding community constitute a violation of this *Code of Conduct*. I understand SEA and SH activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA and SH may be pursued if appropriate.

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.
- **Not** participate in SEA and SH as defined by this *Code of Conduct* and as defined under (*country*) law (*and other local law, where applicable*).

- **Not** use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- **Not** participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- **Not** solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, 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” under this Code.

I commit to:

- Adhere to the provisions of this code of conduct both on and off the project site. Attend and actively partake in training courses related to preventing SEA and SH as requested by my employer.

If I am aware of or suspect SEA and SH, at the project site or surrounding community, I understand that I am encouraged to report it to the Grievance Reporting Mechanism (GRM) or to my manager. The safety, consent, and consequences for the person who has suffered the abuse will be part of my consideration when reporting. I understand that I will be expected to maintain confidentiality on any matters related to the incident to protect the privacy and security of all those involved.

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

- Informal warning or formal warning
- Additional training
- Loss of salary
- Suspension of employment (with or without payment of salary)
- Termination of employment
- Report to the police or other authorities as warranted

I understand that it is my responsibility to adhere to this code of conduct. That I will avoid actions or behaviors that could be construed as SEA and SH. Any such actions will be a breach this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SHA 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: _____
 Name: _____
 Title: _____
 Date: _____