

Host and Rohingya Enhancement of Lives through a Multi-Sectoral Approach

Gender and Sexual Exploitation and Abuse and Sexual Harassment Prevention Plan

Local Government Engineering Department (LGED)

Department of Public Health Engineering (DPHE)

Bangladesh Power Development Board

Roads and Highways Department

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Introduction:

Bangladesh has been coping with the sudden and large inflow of the Rohingya population displaced from Myanmar since 2017. The Bangladeshi host population in the two upazilas are the poorest in the district, with high socio-economic vulnerability. Hosting the DRP continues to stretch service delivery of the GoB, including for host communities, amidst decreasing humanitarian resources. In the Cox's Bazar camps and the surrounding host communities, significant fraction of population does not have adequate access basic WASH facilities. 46 percent of host community households and 17 percent of DRP households use unimproved sanitation facilities.¹

Efforts made by the GoB and Water, Sanitation, and Hygiene (WASH) partners, including the World Bank, have resulted in substantially improved access to WASH facilities (including functional sanitation facilities²) in DRP and host communities. However, this remains an unfinished agenda with significant improvements needed in expansion of community facilities, safety and gender-based violence, In addition weak shelter infrastructure continue to be a challenge in the Cox's Bazar camps. Despite the GoB's continued efforts, critical challenges exist for the DRP and the host communities in fulfilling basic needs and improving livelihoods.

Needs for host communities in Cox's Bazar revolve around five areas: basic services and climate resilient infrastructure; health and nutrition services; gender-based violence response and prevention; education and skills development; and economic opportunities. Due to the high exposure to disasters, measures such as climate resilient infrastructure, cyclone shelters, improved drainage structures, and slope stabilization are also critical. Solar streetlights are an effective measure to minimize gender-based violence at night.

Both Cox's Bazar and Bhasan Char, where 30,000 DRP have been relocated to, are highly vulnerable to climate and disaster risks. In Cox's Bazar, cyclones, flash floods, storm surges, landslides, and fires are identified as disasters that are "very likely" to happen.³ The extreme monsoon rains in August 2023 further triggered flash floods, submerging Cox's Bazar. Around 75 kilometers of roads throughout Cox's Bazar were identified as potentially affected by the floods.⁴ Owing to its location, Bhasan Char is highly exposed to storm surges.

Key needs in Bhasan Char include improvement and maintenance of existing infrastructure; accessibility to neighboring lands; and health, livelihoods and education. Due to inadequate energy storage capacity, critical night load is unmet and PV electricity from the 1-megawatt Solar-diesel hybrid power plant is underutilized. The whole island remains dark in the evening posing security risks. Livelihood opportunities and service delivery are constrained due to the lack of power supply. The condition of roads connecting shelter areas to markets, health care centers, and service facilities, is deteriorating.

¹ World Bank. September 2023, 'Living Conditions Brief, Cox's Bazar Panel Survey Round 2 (2023)'.

² 2023 Joint Response Plan: Rohingya Humanitarian Crisis (January - December 2023).

³ Multi-Hazard Response Plan for Rohingya Refugees in Cox's Bazar District 2022: Anticipatory Action & Response.

⁴ United Nations Satellite Centre. Assessment of Flooded Buildings in Bandarban, Cox's Bazar, Chattogram, and Rangamati Districts, Chattogram Division, Bangladesh as of 12 to 22 August 2023.

Women and children are 14 times more likely to die or be injured during a disaster than men⁵. Vulnerabilities stem from women and girls having limited access to infrastructure that adequately meets their needs. This includes a lack of separate toilet facilities, including WASH facilities with adequate menstrual hygiene management facilities. According to a 2022 study, menstrual hygiene remains poor as 50.5% of adolescent Rohingya girls use old cloth, 10.9% wear underwear without disposable pads, and 25.7% washed their hands before and after changing their pads.⁶ Menstrual hygiene understanding is also limited with only 12% having a primary understanding of menstrual hygiene⁷. The absence of separate toilets and bathing facilities, as well as the lack of convenient and private disposal areas, has repercussions on the health, economic prospects, and educational outcomes of women and girls. Furthermore, there is an information gap arising from disaster preparedness efforts and early warning systems not being inclusive of women. This especially occurs when community mobilizers are men, who women don't feel comfortable communicating with. This discomfort hinders effective information dissemination, particularly regarding early warnings and emergency preparedness. There is a recognized need for a more gender-sensitive approach, with women likely feeling more at ease receiving information from female facilitators,

Therefore, the proposed Host and Rohingya Enhancement of Lives through a Multi-Sectoral Approach Project (HELP) will expand and improve access to basic services and build disaster and climate resilience of the DRP and host communities. The proposed project will contribute to the government's higher-level ambitions while incorporating lessons learned from ongoing projects by following a multi-sectoral approach. The approach will include strengthening climate-resilient WASH infrastructure, improving basic services and disaster-resilient infrastructure, and strengthening institutional systems for service delivery.

Project Development Objective

To improve access to basic services, and enhance disaster and climate resilience of Displaced Rohingya Population (DRP) and the host communities.

Project Components:

Component 1: Resilient Water, Sanitation, and Hygiene (WASH)	DPHE will implement this component, including: <ul style="list-style-type: none"> • Constructing more mini piped water supply schemes and point source water options in Host Communities • Rehabilitating existing water supply and distribution facilities and infrastructure • Operating and maintaining new and existing facilities, especially in DRP camps in Cox's Bazar and Bhasan Char, using solar PV pumping systems • Building or upgrading twin pit toilets and public toilets in Host Communities • Improving existing household toilets and community latrines in DRP camps • Constructing integrated waste management facilities, including solid waste management and fecal sludge treatment plants, in both Host Communities and DRP camps
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⁵ UN Women, 'WHY IS CLIMATE CHANGE A GENDER ISSUE?' (<https://www.unclearn.org/wp-content/uploads/library/unwomen704.pdf>).

⁶ Pandit K, Hasan MJ, Islam T, Rakib TM. Constraints and current practices of menstrual hygiene among Rohingya adolescent girls. *Heliyon*. 2022 May 19;8(5):e09465. doi: 10.1016/j.heliyon.2022.e09465. PMID: 35647348; PMCID: PMC9136249.

⁷ Akter, M., Jamil, S., & Kabir, H. (2023). Recognizing Rohingya adolescent girls' menstrual hygiene in Bangladesh to enhance reproductive health: a commentary. *Annals of Medicine and Surgery*, 85(4), 1304–1305. <https://doi.org/10.1097/ms9.0000000000000283>

	<ul style="list-style-type: none"> • Supplying additional menstrual health and hygiene (MHH) kits for women • Operating and maintaining selected sanitation and hygiene facilities constructed under EMCRP and HELP, especially in camps.
Component 2: Climate and Disaster Resilient Infrastructure, Energy, and Emergency Response	<p><i>Subcomponent 2.1: Rural infrastructure development (implemented by LGED)</i></p> <ul style="list-style-type: none"> • Construction of multipurpose disaster shelters and expanding existing shelters cum primary schools by adding one floor • Rehabilitating rural roads under LGED's jurisdiction with minor capacity enhancements, including roadside drainage and slope stabilization • Reconstruction/rehabilitation of climate-resilient bridges under LGED's jurisdiction • Rehabilitating landing stages in Hatiya upazila (for Host Communities) and in Bhasan Char (for the DRP) • Installing lightning protection systems and solar streetlights • Improving rural markets (hat-bazar) and repairing their roadside drainage networks • Constructing and operating cold storage in Hatiya (for Host Communities) and in Bhasan Char (for the DRP) • Constructing an Emergency Operation Center (EOC) for strategic coordination during disasters and emergencies • Supplying fire safety and search and rescue equipment • Conducting small-scale afforestation activities in Bhasan Char by the Bangladesh Forest Department (BFD) through a Memorandum of Understanding (MoU) with LGED • Operating and maintaining existing basic infrastructure in DRP camps, including renewable energy infrastructure in Bhasan Char, until the commissioning of the proposed solar power plant <p><i>Subcomponent 2.2: Rural roads improvement (implemented by RHD)</i></p> <p>This subcomponent will improve access and connectivity through:</p> <ul style="list-style-type: none"> • rehabilitation of existing rural roads with minor enhancement of capacity under RHD's jurisdiction⁸ • re-construction of climate resilient access and evacuation bridges under RHD's jurisdiction. • installation road accessories and protective measures like drainage and slope stabilization. <p><i>Subcomponent 2.3: Renewable energy</i></p> <p>Implemented by the Bangladesh Power Development Board (BPDB), this subcomponent will finance the construction of a solar power plant in Bhasan Char DRP camps, using battery energy storage systems (BESS) backed up by a diesel generator.</p>
Component 3: Strengthening Institutional Systems to Enhance Service Provision and	<p><i>Different types of capacity building training including the ESF will be provided under this component. The sub-components are as follows:</i></p> <p><i>Subcomponent 3.1: GoB capacity building and technical assistance (implemented by all IAs)</i></p> <p><i>Subcomponent 3.2: Host Communities and DRP awareness raising and skills building programs</i></p> <p><i>Subcomponent 3.3: Reinforcing the Emergency Management Capacity (implemented by LGED)</i></p>

Support Integrated Resilient Development	<i>Subcomponent 3.4: Technology-driven M&E and project management:</i>
Component 4: Contingency Emergency Response (CERC)	This will ensure provision of immediate response to an eligible crisis. In such an event, the component will contribute to immediate and effective response. Any unused balance under the other components can be reallocated to the CERC component, in the event of an emergency.

Key Project Risks: There may be need for temporary land use (to keep construction material, set-up labor camps) also to be managed as per ESS5. The camps in CXB & BC are all under government ownership. Inside the camps there may be some insitu movement of DRP due to construction of toilets, WASH facilities, lighting etc.; this will be avoided as best possible and managed using existing camp relocation protocols and joint verification with UNHCR. The project activities would require labor recruitment - the employed labor will mostly be from the DRP within the camps, and from local people in the HC. The risk of labor influx is minimal. Some outside labor may be required for specialized interventions in the camps. Labor associated risks include OHS issues; unscrupulous labor practices like discrimination; interaction with the HC & DRP, & potential for GBV/SEA/SH. A worker GRM (responsive to SEA/SH) will be developed for workers.

Gender Action Plan

Country Context

Women and girls are disproportionately affected by climate change and disasters in the immediate aftermath as well as during recovery. Despite limited data, it is widely acknowledged that climate change and disasters increase GBV and improved access to GBV services are an urgent priority. For example, in case of Cyclone Amphan, UN Women Rapid Gender Analysis showed that 65% of respondents reported increase in GBV while only 21% respondents reported having access to GBV services. Disasters also widen gender gaps. It is more likely for girls than boys to be pulled out of school to help with domestic chores after a disaster (especially in rural areas). The feminization of Bangladesh's agriculture sector is making women particularly dependent on the environment and natural resources for their livelihood, resulting in women disproportionately bearing the brunt of climate change. Since agriculture-dependent women find it more difficult to move to urban areas and secure new jobs, they are often forced into low-paying work, continuing their cycle of vulnerability. During storms, agricultural jobs, mostly held by women are lost due to salinity intrusion, which has increased by 26 percent in the past 35 years in Bangladesh. In addition to being disproportionately impacted by climate disasters, women and girls face gender-specific barriers in adapting to climate change. A key recommendation of the Bangladesh Country Gender Assessment to enhance women's voice and agency and engage men and boys (Pillar 4) is to enable women's participation and leadership across sectors, especially in disaster preparedness. Specific highlighted actions to address this recommendation include ensuring women's engagement in disaster preparedness plans; and ensuring early warning signals reach women and that shelters have safe spaces and facilities for women.

Sectoral context:

Women and girls have limited access to climate and disaster-related infrastructure that fulfills their differential needs and provides security. In 2021, 52 percent of 3.3 million people affected in floods in 21 districts were women, however only 25,377 women took shelter as the informal infrastructures were not equipped to offer protection for women and girls for prolonged period. In the absence of national data, the district data from 2020 floods show that fewer women use shelters compared to men. Differential needs for women, such as separate toilet facilities with WASH facilities, menstrual hygiene management facilities, childcare facilities and private spaces for pregnant or breast-feeding women, and GBV services are often lacking in shelters. Examining usage of cyclone shelters, studies show that women do not seek refuge in cyclone shelters due to lack of separate toilets and spaces for women – 35% of the non-evacuee respondents cited these two reasons for not using shelters. For example, out of the 622 shelters in Cox's Bazar District, only 33 percent have separate toilets and 8 percent have women's spaces. Many shelters also do not provide spaces for women to conduct their livelihood activities. Shelters increase GBV risks as men and women are forced into a space together under highly stressful situations. Therefore, many women and girls do not take refuge in shelters due to concerns for personal security.

Moreover, women tend to be less informed about available shelters and facilities. The World Bank's qualitative study indicates that when asked about shelter home availability, higher proportion of females said shelter homes were not available compared to males. The Government of Bangladesh has been improving the design of shelters incorporating gender-sensitive features, such as the ones under the Bank-supported Multipurpose Disaster Shelter Project under implementation, to address such gaps and needs. Further, engaging women in preparing disaster preparedness plans is critical to ensure that their differentiated needs and concerns are considered. Engaging women in preparing disaster preparedness plans is critical to ensure that their differentiated needs and concerns are considered. A study showed

that 65% of women respondents were not consulted by service providers and only 13% of respondents noted that women-led NGOs were involved in disaster response.

Scarcity of gender-disaggregated data worsens the challenge of ensuring that disaster-related infrastructure responds to women's and girl's priorities. Existing data collection methods are not inclusive or do not show gender, age and disability disaggregated information of the affected population and impede human-centered infrastructure design. Challenges in data collection include limited capacity; short data collection periods; lack of female trained staff; local authorities are unwilling to release data to the national level; rushed reporting of data. Limited gender disaggregated data is making it difficult to translate to the UNFCC's gender-specific actions.

The successful implementation of the project activities calls for a robust Gender Action Plan.

The Gender Action Plan:

The Gender Action Plan ensures that gender equality is considered in project preparation and implementation in accordance to the Country Partnership Framework and System Country Diagnostic, and Climate Change Action Plan 2021-2025. The project will contribute directly to the Government's strategies by taking a community participatory approach to build and maintain flood resilient infrastructure and social structures that aim to reduce flood risks of affected communities.

The Gender Action Plan also ensures compliance with the World Bank's support of the Sustainable Development Goals and 2015-23 World Bank Group Gender Strategy. It aims to move the Bank's development work beyond gender mainstreaming to reducing gender gaps in the disaster and climate change sector. The proposed Gender Action Plan will be further revised by the gender specialist in the PIU before the start of implementation.

The overall objective of the Gender Action Plan is to identify entry points to increase women's knowledge and use of menstrual health and hygiene products and increase their disaster preparedness through early warning systems. The project will improve menstrual health and hygiene (MHH) by providing (a) separate toilets, bathing facilities, and disposal sites as part of the component activity focused on building WASH facilities, (b) an awareness-raising campaign on MHH, integrated into broader programs on WASH and hygiene promotion, (c) capacity building for officials on MHH management, (d) links with civil society groups or private sector initiatives providing sanitary supplies. The project will also strengthen women's climate resilience and participation in community-based disaster risk management, including early warning systems, by (a) increasing the share of trained women facilitators who can effectively engage with women and girls in the community, (b) providing targeted trainings for women, and (c) building capacity of DRM agencies and local women's organizations. It will establish separate and sufficient women's only areas with separate toilets and other water access, sanitation, and hygiene (WASH) facilities that consider menstrual hygiene management; ensure complete privacy, proper lights and working locks in these areas. Targeted information dissemination on the shelters will help to ensure that women are adequately informed about the available facilities.

Table 1: Gender Action Plan

Objective	Actions	Responsibility	Timeline
Gender Assessment	Rapid gender assessment including situation of GBV/SEA/SH in the sector to refine the gender action plan. The assessment will review existing policies, strategies and provision on gender inclusion. It will also carry out stakeholder consultation to prioritize project activities. It will further contribute to the Gender Action Plan	PIUs, gender and GBV specialists and Monitoring and Evaluation Firm	Before start of implementation of the project
Component 1: Resilient Water, Sanitation, and Hygiene			
Safe and Gender Sensitive sanitation facilities constructed	Consultation with women girls and other vulnerable group on their perceived safety needs	PIUs, gender and GBV specialists	Before works begin
	Improved sanitation facilities in community latrines in camps including separate female bathrooms with working locks, appropriate lighting and menstrual hygiene management facilities.	PIU, gender and GBV specialists	After construction
	Female cleaner to manage the women's toilets and dispose of MHH waste.	PIU, gender and GBV specialists	After construction
	Awareness raising programs for MHH to increase MHH knowledge and practices led by female instructor.	PIU, gender and GBV specialists	After construction
	Recruite women and girls as community volunteer and build their capacity as skilled facilitator	PIU, gender and GBV specialists	During the project implementation
	Prepositioning of MHH package before disaster to ensure adequate supply of MHH products/package (pads, sanitary napkins, menstrual cups, soap etc. as per global standards) during and after disaster.	PIU, gender and GBV specialists	During the project implementation
Component 2: Climate and Disaster Resilient Infrastructure, Energy, and Emergency Response			
Gender Friendly Shelter Construction	Consultation with women and other vulnerable groups on multipurpose shelter design in terms of gender (e.g., women-friendly spaces, separate toilets, breast feeding corner, children zone), disability (e.g., ramps for entrance), and other vulnerabilities.	PIU, gender and GBV specialists	Before the shelter design
	Share the design with women and community and incorporate their opinions in the design.	PIU, gender and GBV specialists	Before finalization of shelter design
	Safety Audit before finalization of shelter place to know about any possible GBV risk in the area or in connecting road.	PIU, gender and GBV specialists	Before finalization of

			shelter place and design
	Include Women in maintenance committee for regular operations and maintenance of the shelters along with associated facilities.	gender and GBV specialists PIU	After the shelter construction
	Consultation and validation with women and community before handover the shelter to ensure women and other vulnerable groups' needs are addresses	PIU, gender and GBV specialists	Before handed over the shelter to community
	Include Women in shelter management and maintenance committee for regular operations and maintenance of the shelters along with associated facilities.	gender and GBV specialists, PIU	After the shelter construction
Gender-Friendly Safety Measures	Ensure appropriate lighting and signage on roads, facilities, toilets and shelters	PIU, gender and GBV specialists	During implementation
Community Engagement to increase flood resilience and improve livability	Include women and vulnerable populations in decision making process of on technical design features of climate-resilient infrastructure, and disaster and emergency response services e.g. road, bridge, market design, aid services.	PIU, gender and GBV specialists	Before the community infrastructure design
Gender sensitive disaster preparedness and response in Early Warning Systems (EWS)	Consult with women, children, person with disability and other vulnerable group to include their need in contingency plan	PIU, gender and GBV specialists	Before Developing the Disaster plans
	Review the EWS to find the gap considering gender related barrier like education, access to information, digital divide, access to resource and update EWS to make it gender friendly and inclusive.	PIU	Before the EWS review
	Recruit women in CPP volunteer pool and promote them leadership positions	PIU	During recruitment
	Awareness program like community session, mock drill, simulation, theatre or street drama, so that women and girls will be aware about EWS.	PIU	Throughout the project
Component 3: Strengthening Institutional Systems to Enhance Service Provision and Support Integrated Resilient Development			
Targeted information dissemination to increase MHH knowledge and practices	Recruite Gender and GBV specialist at PIU/Institutional level	PIU	Before the implementation
	Develop gender sensitive communication materials on MHH to create awareness among women and girls	PIU, gender and GBV specialists	During project implementation
	Capacity building of PIU and implementing agency to design Campaigns that consider special measures to reach women and girls from hard-to-reach area in HC	PIU, gender and GBV specialists	Before the campaign commence

Data collection on gender issues related to shelter usage, MHH practices and EWS	Collect gender disaggregated data from the project.	PIU, gender and GBV specialists	During implementation
Community engagement campaigns	The campaign will consider the gender sensitive tools to ensure participation of women, girls, children, elderly and person with disability	PIU, gender and GBV specialists	During project implementation
	Engage women and girls as volunteer and facilitator of the campaign as the first responder of disaster	PIU, gender and GBV specialists	During project implementation
Community risk mapping	Engage Women and girls in community risk making process to identify their risk and vulnerability and consider the findings in all plans	PIU, gender and GBV specialists	During project implementation
	Introduce tools like safety audit will be utilized to identify key risk of women' safety and violence against women and girls in emergency in shelter, in distribution points, in accessing humanitarian aids,	PIU, Gender specialist, GBV expert for safety audit	During project implementation
Management of evacuees and shelters	Include women in shelter management and evacuation	PIU, gender and GBV specialists	During the evacuation plan
	Develop and Include GBV/SEA/SH referral pathway in shelter management plan	PIU, gender and GBV specialists	During the evacuation and management plan
	Capacity building of shelter management and evacuation team on referral pathway, GBV/SEA/SH issues in emergency and the reporting	PIU, gender and GBV specialists	During project implementation
Community operations and maintenance (O&M)	Include women and other vulnerable community group along with SMC in capacity building training for O&M	PIU, gender and GBV specialists	During project implementation
Established Feedback Mechanism for Women and Vulnerable Populations	Establish an inclusive Feedback mechanism that will ensure women and other vulnerable groups' perspectives and needs are incorporated throughout the construction process so the women can take an active role in the oversight and monitoring of the infrastructure work	PIU, gender and GBV specialists	During the construction
Project monitoring	PIU officials will be trained on Gender, GBV/SEA/SH in emergency, gender responsive planning and monitoring	PIU, gender and GBV specialists	Before the project implementation and it will continue during implementation

SEA/SH Risk Mitigation Plan

Project Name	Host and Rohingya Enhancement of Lives through a Multi-Sectoral Approach
Risk Rating	Substantial

SEA/SH project risks

Bangladesh is among the countries with the highest levels of gender-based violence (GBV) in South Asia. The added vulnerabilities of refugees and host community of Cox Bazar, one of the poorest districts of Bangladesh increases the prevalence of GBV, which is the highest within the host community in Chattogram division⁹. A survey (2015)¹⁰ on violence against women found that 48 percent of ever-married women in Chattogram division experienced violence. Child marriage increased in Cox Bazar District after the pandemic – it was 75% in Ukhiya, 66% in Teknaf, 61% in Moheskhal, 54% in Kutubdia¹¹, where many host and DRP beneficiaries of World-Bank financed projects reside. An IRC also reveals a staggering 39% surge in child marriage after climate-induced disasters in Bangladesh¹².

Approximately 52 percent of the DRP are women and girls, and most have been subjected to GBV prior to fleeing to Bangladesh. While more women are now stepping out of the confines of their homes, stringent social norms, fear of sexual assault, and rising Intimate Partner Violence (IPV) remain as risks. Displaced Rohingya women and girls continue to be vulnerable to GBV and their situations are made worse by climate-induced disasters.

The SEA/SH risk rating at concept stage is ‘Substantial,’ this is especially due to the FCV context of the project, peri-urban location, mix of local and outside labor influx and the project location being close to schools or areas where women and young girls have increased mobility. Although labor influx is low, given the camp setting, the risk is higher. The project will continue to assess these risks further and develop mitigation measures during project implementation. For this level of SEA/SH risk, both a GBV and Gender specialist within the IA will be assigned, a robust SEA/SH responsive GRM will be established through which cases will be referred to mapped GBV service providers, a code of conduct will be developed and signed by workers and an SEA/SH Action Plan will be developed and implemented.

Part 3: Local institutional environment for safety of women and girls

- *In addition to national laws, are there any additional local rules in place to prevent SEA/SH or protect survivors. No need to list national laws on GBV prevention and response.*
- *Briefly describe existing local practice when responding to GBV cases? Who is involved (local leaders, local NGOs, informal groups)? What key services are available?*

NGOs are working for GBV response like legal support, psychosocial support, mediation, social integration, shelter, livelihood, health ect. Sometime Local government representatives do Shalish

⁹ Cox's Bazar is a district in Chattogram division

¹⁰ Violence Against Women (VAW) Survey 2015, Bangladesh Bureau of Statistics

¹¹ Dhaka Tribune. (2021, October 2). *Child marriage rates soar in Cox's Bazar in the shadow of pandemic*. Dhaka Tribune; Dhaka Tribune. <https://www.dhakatribune.com/bangladesh/nation/260339/child-marriage-rates-soar-in-cox-s-bazar-in-the>

¹² Bangladesh: IRC study reveals a staggering 39% surge in child marriage due to climate change. (2022). The IRC. <https://www.rescue.org/press-release/bangladesh-irc-study-reveals-staggering-39-surge-child-marriage-due-climate-change>

(Mediation) for GBV cases which is used for most GBV cases in rural areas. Religious leaders/ elit people in rural area also involve in the process. In camp Majhi/religious leader/CiC do the same. These are very common practice in Bangladesh. Survivors and their family take this support mostly to avoid the legal process because of its complexity.

Part 3: PIU's capacity to prevent and respond to GBV risks

Both LGED and DPHE are very familiar with Bank safeguard policies as well ESF and have a satisfactory track record of implementing ES management activities in Bank-financed projects. The IAs have received intensive trainings on labor management, occupational health and safety, community health and safety, waste management, multi-stakeholder engagement through out the EMCRP implementation. The DPHE and LGED will continue to have the existing Environmental and Social institutional setup of EMCRP for the proposed HELP project.

Table 2: SEA/SH Risk Mitigation Plan

S/N	Objectives	Activities	Timing for action	Responsible	Indicator	Ongoing risk management	Budget
1.	GBV Expert installed	•GBV Expert in PIU and Supervision Consultant team	Preparation and Implementation	PIU	•GBV Expert is installed	Ongoing communication with GBV Expert and PIU	
2.	Sensitization of IA addressing GBV/SEA/SH risk on project and the mechanism of implementation	•Consultation with PIU •Training/orientation session carried out to sensitize PIU on importance of addressing GBV/SEA/SH risks and investigation of GBV cases and documentation focusing on survivor centric approach	Preparation and implementation	Task Team	•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	•Task team to monitor and provide additional guidance as necessary	
3.	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.	Consider GBV risk in all safeguard's documents Include GBV risk issues in consultation agenda Incorporate feedback in project design	Preparation Implementation (before civil works commence). In line with SEP hold Consultations need to be continuous throughout the project cycle, not just during preparation.	PIU for social assessment and ESMP. Contractor for C-ESMP	GBV is included in all safeguard's documents Feedback from community are address in project design and activity	<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, 	<ul style="list-style-type: none"> •

						particularly when C-ESMP is updated	
4.	Robust 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 requirements will be required to be reflected in their C-ESMP.</p>	Before civil works commences	IA (Social Specialist with GBV/Gender Expert or Gender consultant)	GBV action plan developed	<ul style="list-style-type: none"> • Ongoing review during implementation support missions. • Update project ESMP if risk situation changes. 	•
5.	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 Cox Bazar District • 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 	Prior to contractor mobilizing.	IA, GBV Expert	<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.	

		<p>documentation for complaint registration and management; investigation and confidential reporting with safe and ethical documenting of SEA/SH cases considering survivor centric approach</p> <ul style="list-style-type: none"> • Inform community and Primary schools about GBV sensitive GRM • Provide appropriate referral to survivors • Develop Accountability and Response Framework (Annex 4) and a referral process flowchart to respond to cases 					
6.	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 including sub contractors • Ensure requirements in CoCs are clearly 	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 	•

		<p>understood by those signing.</p> <ul style="list-style-type: none"> • 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. 				<p>and that workers have been trained and understand their obligations.¹³</p> <ul style="list-style-type: none"> • Monitoring of GRM for GBV complaints. Discussion at public consultations. 	
	<p>Community awareness raising and trainings for all actors involved in the project on GBV/SEA/SH</p>	<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 and reporting 	Implementation	IA, GBV Expert, Contractors, Consultants	<ul style="list-style-type: none"> • Number of project worker trained • Number of Community people trained 	<ul style="list-style-type: none"> • Ongoing reporting 	<ul style="list-style-type: none"> •
7.	<p>Procurement: Clearly define the GBV/SEA/SH requirements and expectations in the bid documents and</p>	<ul style="list-style-type: none"> • Formulate and adopt SEA/SH informed bidding document. • Inform the contractors and provide orientation 	Procurement	IA	<ul style="list-style-type: none"> • SEA/SH requirement and expectation are adapted in bid document. 	<i>Review by Task Team</i>	

¹³ 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.

	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 documents for a CoC which addresses GBV.	<ul style="list-style-type: none"> • Evaluate contractor's ability to meet project's SEA/SH prevention and response requirement prior to finalize the contract. • Evaluate contractor's and sub contractor's CoC 					
8.	Review C-ESMP to verify that appropriate mitigation actions are included	<ul style="list-style-type: none"> • Review C- ESMP • Address gap if any 	Implementation	PIU	C-ESMO included GBV mitigation measures	<i>Reviewed by Task Team, WB</i>	
9.	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 	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. 	•

		<p>project site is an area where SEA/SH is prohibited.</p> <ul style="list-style-type: none"> • As appropriate, public spaces around the project grounds should be well-lit 					
10.	<p>M&E</p> <p>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.</p>	<ul style="list-style-type: none"> • Review the GRM mechanism • Addressing gap if any 	Implementation	Task Team. IA, GBV Expert	<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. 	•
11.	<p>M&E and reporting of GBV/SEA/SH action plan</p>	<ul style="list-style-type: none"> • Undertake regular M&E of progress on GBV/SEA/SH activities, including reassessment of risks as appropriate. • Conduct M&E field visits. • Review quarterly the action plan and progress against indicators listed 	Implementation	IA, GBV Expert, 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. 	•

		• Provide quarterly report					
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Annex 1: Sample Labor Code of Conduct covering the GBV/SEA/SHA 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 and Abuse (SEA)¹⁴

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 another¹⁵.

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

Sexual Harassment:¹⁶

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

Sexual Harassment versus SEA¹⁷

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 Conduct¹⁸ 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.**

¹⁴ As defined in the UN Secretary’s bulletin – Special Measures for protection from sexual exploitation and abuse October, 9, 2003 ST/SGB/2003/13

¹⁵ In the context of World Bank Financed operations exploitation occurs when access to, or benefit from a World Bank Financed good or service is used to extract sexual gain.

¹⁶ Inter-Agency Standing Committee *Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community based complaint mechanism. Global standard Operating Procedures.* May 2016

¹⁷ Ibid

¹⁸ In accordance with the United Nations Convention on the Rights of the Child.

There is no consent when agreement is obtained through:

- the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation
- the use of a threat to withhold a benefit to which the person is already entitled, or
- a promise is made to the person to provide a benefit.

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:

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.

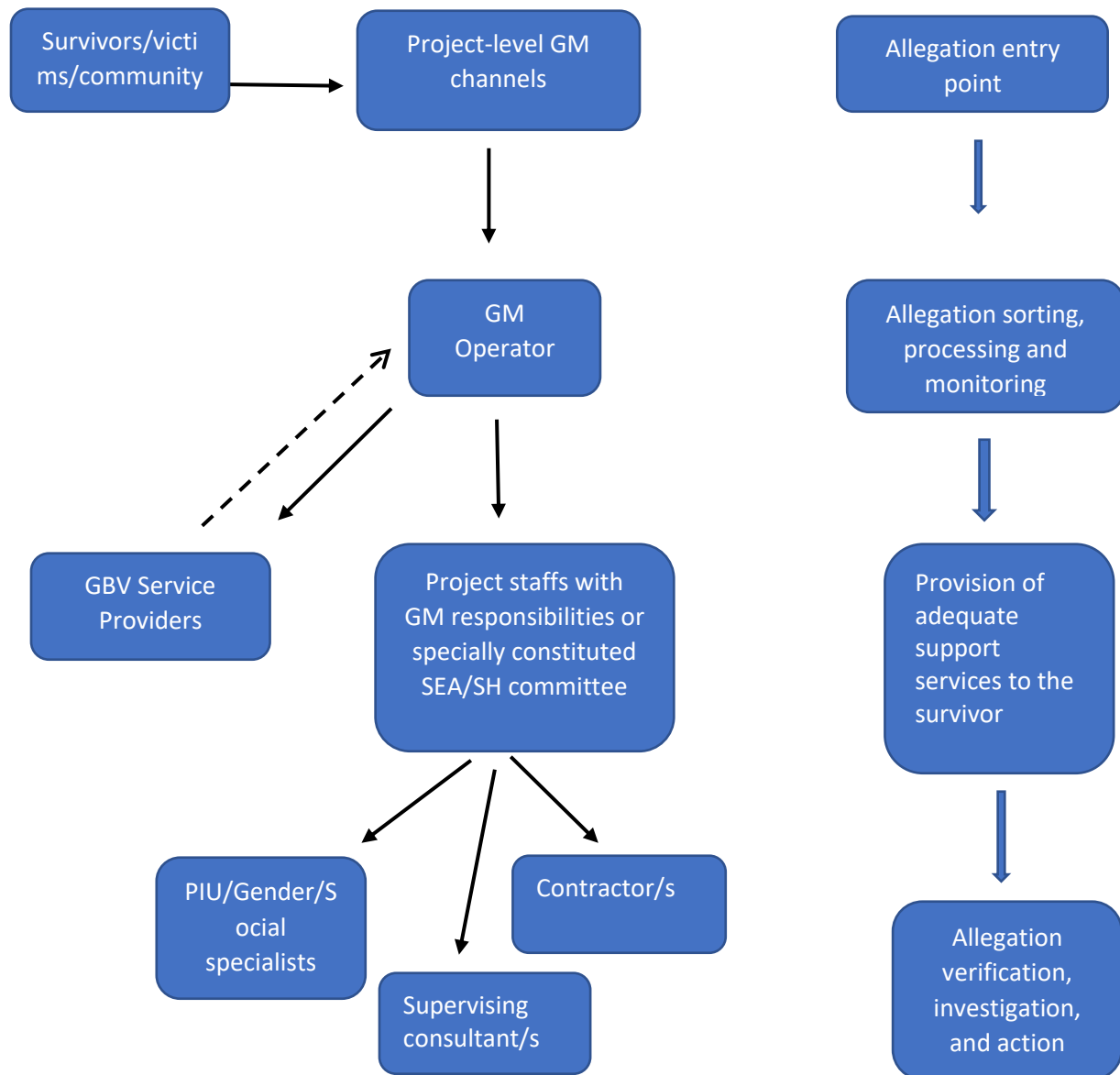
Signature: _____

Printed Name: _____

Title: _____

Date: _____

Annex 2: Project Grievance Mechanism to address GBV/SEA/SH Allegations



Annex 3: Operating Procedures and Response Protocol for SEA/SH Allegations

