



**Government of the People's Republic of Bangladesh
Local Government Engineering Department (LGED)**

**Standard Operating Procedure of LGED to
Redress Gender-Based Violence (GBV)**



December, 2025



Message

Under the financing of the World Bank, the Local Government Engineering Department (LGED) has been implementing the “Program for Supporting Rural Bridges (SupRB)”, which plays a pivotal role in improving rural communication infrastructure in Bangladesh. Alongside ensuring community participation and women’s involvement in the project, various social protection measures are put in place to prevent gender inequality, gender-based violence (GBV), sexual harassment, and other associated risks.

Within LGED, a Grievance Redress Mechanism (GRM) has been established to prevent and respond to gender-based violence and sexual harassment. For this purpose, clearly defined institutional structures, responsible persons, and committees have been designated to ensure accountability and effective action.

In line with LGED’s commitment and policies under the SupRB program, a guideline in the form of a **Standard Operating Procedure (SOP)** has been developed for the prevention of and response to gender inequality, gender-based violence (GBV and sexual harassment, and this SOP has been duly approved by LGED. This Manual has been prepared based on that Standard Operating Procedure (SOP).

The Manual primarily aims to provide an overall understanding of LGED’s mechanisms for the prevention of and response to GBV and sexual harassment. In addition, it briefly outlines the institutional framework, responsible officials, and grievance redress processes related to that. The overarching objective of this Manual is to enhance the knowledge and capacity of employees at all levels to ensure gender equality and eliminate gender-based discrimination, thereby translating LGED’s commitments and the government’s pledges into effective implementation.

Through the application of this Manual, all responsible persons and institutional structures involved in grievance resolution related to gender inequality, gender-based violence, and sexual harassment will be able to play a vital role in effectively implementing LGED’s commitments.

I would like to express my sincere appreciation and thanks to all the members who actively participated for enriching the manual by providing their valuable comments during preparation, compilation and development.

A handwritten signature in black ink, appearing to read 'Kazi Golam Mostafa'.

(Kazi Golam Mostafa)
Chief Engineer

Local Government Engineering Department



Message

With financing from the World Bank, the Local Government Engineering Department (LGED) is implementing the Program for Supporting Rural Bridges (SupRB), which plays an important role in improving rural connectivity in Bangladesh. The program emphasizes community participation and women's engagement, while integrating social protection measures to prevent gender inequality, gender-based violence (GBV), sexual harassment and related risks.

To address these concerns, LGED has established a Grievance Redress Mechanism (GRM) with clearly defined institutional arrangements, responsible officials, and committees to ensure effective prevention and response.

In line with LGED's commitments under the SupRB program, a Standard Operating Procedure (SOP) for preventing and responding to gender inequality, GBV, and sexual harassment has been developed and approved. This Manual is based on that SOP and provides an overview of relevant mechanisms, institutional frameworks, and grievance redress processes. Its objective is to strengthen the knowledge and capacity of employees at all levels to promote gender equality and eliminate discrimination.

Preventing and addressing gender inequality, GBV, and sexual harassment is a shared responsibility. LGED remains committed to fostering a safe, dignified, and respectful working environment. This Manual will support responsible personnel and institutions in effectively implementing LGED's commitments.

I would like to convey my thanks and gratitude to the personnel who were involved in preparation, compilation and development of the manual by providing their valuable comments, views and thoughts in order to enrich the Manual.

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Acronyms

CEDAW:	Convention on the Elimination of all forms of Discriminations Against Women
CSHPC:	Central Sexual Harassment Prevention Committee
DGRC:	District Grievance Redress Committee
DSHPC:	Divisional Sexual Harassment Prevention Committee
GAP	Gender Action Plan
GBV:	Gender-based Violence
GRM:	Grievance Redress Mechanism
GRO	Grievance Redress Officer
GRS:	Grievance Redress System
HSHPC:	Headquarter Sexual Harassment Prevention Committee
IO:	Investigating Officer
LGRC/WGRC:	Labor/Worker Grievance Redress Committee
LGRM/ WGRM:	Laborers/Workers Grievance Redress Mechanism
MGRC:	Ministry (Level) Grievance Redress Committee
PGRC:	Project Grievance Redress Committee
RSGAP	Rural Sector Gender Action Plan
RSHPC:	Regional Sexual Harassment Prevention Committee
SDGs:	Sustainable Development Goals
SEA:	Sexual Exploitation and Abuse
SH:	Sexual Harassment
SHPC:	Sexual Harassment Prevention Committee
SOP:	Standard Operating Procedure
SupRB:	Supporting Rural Bridges
UDHR:	Universal Declaration of Human Rights
UGGRC	Upazila GBV Grievance Redress Committee
UGRC:	Upazila Grievance Redress Committee
USGAP	Urban Sector Gender Action Plan
VAW	Violence Against Women
WRSGRP	Water Resource Sector Gender Action Plan

1. INTRODUCTION

1.1 Background

Local Government Engineering Department (LGED) is implementing the Program for Supporting Rural Bridges (SupRB) since 2019. The project is aimed at providing uninterrupted connectivity between areas of agricultural production, growth centers and rural markets located in the project area and enhance earning opportunities creating uninterrupted access to the commercial institution and basic services like health and education for the rural poor. The expected impact of the project will be to considerably reduce poverty in the intervention areas. The other objectives of the program are to improve and preserve climate resilience, enhance institutional capacity for development, maintenance and management of rural bridge assets, Environmental & Social Safety and institutionalize Grievance Redress Mechanism (GRM) especially, grievances related to Gender Based Violence (GBV).

1.2 LGED & Women Empowerment

LGED's policy is to ensure increased participation of women in all the interventions including identification, design, and implementation of activities and jobs created under SupRB. This is in turn promoting equal behavior and increased economic opportunities for women. At the same time, it facilitates in organizing campaigns toward prevention of violence against women including discrimination, Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) etc. SupRB (LGED) is also sponsoring gender mainstreaming activities with a view to enhance institutional capacity of LGED in promoting and monitor women's engagement in all stages of the project along with managing prevention/mitigation of Gender-Based Violence (GBV) risks.

Standard Operating Procedure (SOP)

A Standard Operating Procedures (SOP) based on best practices is essential to implement Grievance Redress Mechanism (GRM) related to GBV grievances i.e. GBV-GRM in order to effectively deal with GBV incidents and collect information on instances of SEA/SH in coordination with the project task team and implementation unit. SOP to Redress Gender Based Violence (GBV) grievances is a new document which will assist to prevent or redress violence on women.

1.3 Scope of SOP

1.3.1 Legal Perspective

- i. LGED is the pioneer engineering institution rendering unprecedented contribution to the economy and livelihood standard of rural Bangladesh through development of rural infrastructure integrating contemporary women-friendly policies and practices in all of its activities.
- ii. It has meanwhile developed policies and action plans (For example it has own Gender Action Plan) to not just ensure and enhance employment opportunities for women, but also institutionalize a violence-free environment for them (despite it is not its sole responsibility to strengthen/ engender, policy formulation/ planning and enactment/ implementation or reformation of laws regarding women's rights).
- iii. LGED is committed to institutionalize gender-friendly policies and strategies in all of its activities in its upcoming activities with world class standards. It has "Gender Forum" in Head Quarter level to facilitate such activities.

1.3.2 Institutional Perspective

The procedures as provided/included in for "Grievance Redress Mechanism (GRM) for Gender-Based Violence (GBV) of LGED" applies to:

- i. All Officials/Staff (either revenue or Non-revenue)/Consultants working either at the Head Quarter Level or at the Field Level.
- ii. All ongoing civil works (worksites) of all Sectors of LGED; Namely, a) Rural, b) Urban, and c) Small Scale Water Resources Sector.
- iii. All laborers, contractors, contractors' representatives within the jurisdiction of LGED activities in all the sectors (Namely, Rural Infrastructure Development, Urban and Small-Scale Water Resources Development Sectors);

1.4 Objectives

The main objective of this "Standard Operating Procedure (SOP) of LGED is to Redress Gender-Based Violence (GBV) Grievances. These detailed objectives are to:

- a) Enhance knowledge on GBV and LGED mandate on women's empowerment of all LGED staffs and relevant stakeholders;
- b) Support for making "GRM for GBV" available and operational in LGED jurisdiction;
- c) Activate and responsive Grievance Redress Mechanism (GRM) at all level in LGED to provide support to the survivors of Gender-Based Violence (GBV) for ensuring justice;
- d) Build the capacity of LGED Officers/Staff/project related staff (in applicable cases), labor, contractors/ representatives of contractors to deal GBV issues as per guidelines of LGED;
- e) Assist LGED Officials/Staff, contractors/contractor's representatives, Site Managers/Labor Sardars and Laborers in understanding and following the Code of Conduct (CoC) and "GRM for GBV";
- f) Collect information and documentation on instances of Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH) effectively in coordination with:
 - o *Field Offices of LGED;*

- *LGED Gender Forum;*
- *Project Task Team (in applicable cases);*
- *Project Implementation Unit (PMU) (in case of Project Specific Activities);*

1.5 Definitions

For better understanding and use of this document the following terminologies will mean as follows unless otherwise mentioned or clarified:

Standard Operating Procedure (SOP): Standard Operating Procedure (SOP) is the Guiding document to support LGED in operating the Grievance Redress Mechanism for Gender-Based Violence (GRM for GBV).

Adolescent: Any person between the ages 10-17 years old. Early adolescents are 10- 14. Later adolescents are 15-17.

Adult: Any person (Male or Female) over the age of 18 years and older.

Advocacy: Advocacy is defined as any action that speaks in favor of, recommends, argues for a cause, supports or defends or pleads on behalf of others.

Advocacy Counselor: Advocacy counselor is a trained staff/person working for Gender Based Violence (GBV) service and provides advocacy-based counseling and supportive services to SupRB (LGED).

Assessment: Assessment is the systematic collection, review, and use of qualitative and quantitative data to improve learning and development regarding specific purpose.

Community: A group of people sharing common cultural, religious or other social features, backgrounds and interests, to Abbreviation/acronyms collective identity often in a defined geographical area.

Contractor: An organization or individual registered with LGED and/or other departments of the Government of Bangladesh who directly employs or engages workers/laborers or as part of their business carries out, manages or controls civil work (e.g., building, altering, maintaining or demolishing Roads/Road Structures/ Water Structures/ Buildings etc.).

Confidentiality (GBV Incidence): Confidentiality about GBV incidence (abuse etc.) means service providers never discuss case details with family or friends, or with colleagues whose knowledge of the abuse is deemed unnecessary and/or who express intent to harm themselves or someone else.

Coordinating Agencies: The organizations that take the lead in coordinating GBV working groups/individuals and ensuring the minimum prevention and response interventions.

Disclosure: The process of revealing information about a GBV experience or incident. Disclosure in the context of GBV abuse refers specifically to how a person (e.g., female laborer) learns about a GBV directly from a victim (survivor).

Early Marriage: Early marriage is a formal marriage before age 18.

Empowerment of women: The practice of women gaining power and control over their own lives. It may include building self-confidence, elaboration of choices, increased access to and control over resources.

Focal point (GBV): The designated staff who represent their organization, community structures and/or their sector and participate in meeting and coordination activities related to GBV.

GBV Counselling: A dynamic process of interaction between the GBV victim and Counseling person (who helps the victim to identify and process symptoms of bad experience and to take decisions to help in alleviating suffering) providing access to information, resources and services, ensuring the respect of individual rights and facilitating access to services, community resources and support.

Gender: Gender refers to the context and time specific and changeable behaviors, social attributes and opportunities associated with being a particular sex.

Gender-Based Violence:

Definition of GBV of LGED

GBV is an umbrella term for any harmful act that is perpetrated against a person's will and is based on socially ascribed (i.e., gender) differences between men and women and boys and girls. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such actions, coercion, and other deprivations.

UN Definition of VAW

The United Nations defines violence against women 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."

Grievance Redress System (GRS): A platform through which citizens can send a formal complaint to the Government to express their dissatisfaction with public service providers.

Grievance Redress Mechanism (GRM): A locally based, formalized way to accept, assess, and resolve community feedback or complaints.

(GBV) Awareness Raising: Activities conducted with the affected community (Target Group) to increase their knowledge of GBV.

Health: A sound state of the body and mind of a laborer that enables him/her to perform his/her job normally in a state of well-being;

Humanitarian Worker: An employee or volunteer (Government/private, formally/ informally engaged from the beneficiary community/humanitarian agency/NGO to conduct the activities related to GBV.

Influx: An arrival or entry of large numbers of people or things to any places/area/ region/community.

Information Management: The process of handling or controlling information concerning GBV of an organization (usually including different stages of processing information such as collection, storage, analysis and reporting/sharing in a way that ensures security and confidentiality of the data).

Laborer/Worker: Someone (irrespective of Gender) who is deployed/ hired/appointed and works for or under the control of a contractor on a construction site.

Labor Influx: The rapid migration to and settlement of laborers/ workers and followers in project areas of influence;

Mandatory Reporting: A responsibility for humanitarian actors/responsible person/officer/staff who hear about and/or receive a report of sexual exploitation or abuse happened against a member of the affected population.

Medical Care: Medical care for victims (survivors) of GBV for injuries and mental health, as well as for sexual reproductive health issues. This shall include documentation and treatment of injuries, collection of forensic evidence, evaluation for prevention of sexually transmitted infections, risk of pregnancy, psychosocial support and counseling.

Measures: A plan or course of action taken to achieve a particular purpose;

Mitigation: Reducing risk of loss from the occurrence of any undesirable event;

Perpetrator: A person, group or institution that directly influences or otherwise supports violence or other abuses against their will.

Prevention: Taking action to stop GBV from first/subsequent occurrences.

Protection: Activities to restore rights of individual (in the perspective of GBV) in accordance with the laws/provisions and spirit of human rights (both national and international standards).

Psychological First Aid: Humane, supportive and practical assistance (listening, providing information on available support services and helping to access basic needs like foods/water etc.) to victims (survivors) of GBV.

Psychosocial Support: Services and assistance (improving a survivor's wellbeing by healing, restoring the normalcy of life and protecting from the accumulation of distressful and harmful events) for addressing the harmful emotional, psychological and social effects of GBV.

Response: Providing services and supports (health and medical care, mental health and psychosocial support, legal assistance, case management, education and vocational training opportunities in applicable cases) to reduce harmful consequences of GBV and prevent further injury, suffering or harm.

Risk: A situation involving potentiality of exposure to danger;

Risk Management: A systematic process to identify, evaluate and address risks.

Safety Audit: A tool used to compare general and specific living conditions of communities and people especially in emergency-affected areas to improve social safety and security conditions including GBV based on a set of pre-selected indicators.

Sexual Violence: Any sexual activity (rape, attempt of rape, sexual abuse and sexual exploitation)/attempt (unwanted sexual comments or advances/acts to traffic a person's sexuality) using coercion, threats of harm or physical force by any person regardless of relationship to the victim, in any setting, including but not limited to home and work.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, including both actual and attempted abuse, whether by force or under unequal or coercive conditions with a person under 18 years-old is considered sexual abuse.

Sexual Assault: Any form of non-consensual sexual contact that does not result in or include penetration (e.g., attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks).

Sexual Exploitation and Abuse: Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual Harassment: Undesired sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature (e.g., touching, kissing or speaking in an unsuitable sexual manner to a colleague at work; indecent/offensive gestures; disturbing behavior like irritation/annoyance, spying, aggravation for sex etc.).

Survivor/Victim: A person who has experienced GBV. “Victim” is more often used in the legal and medical sectors whereas “Survivor” is generally preferred in the psychological and social support sectors.

Worksite: Office, premises or worksite where the laborers/workers are habitually employed/deployed including the office or places where the laborers/workers (having no or specified worksite) report for assignment he/they is/are responsible for.

2. GENDER BASED VIOLENCE (GBV) SCENARIO IN CONSTRUCTION INDUSTRY

2.1 What Gender-Based Violence (GBV) Really is?

It is an accepted reality that most gender-based violence is inflicted by men on women and girls. Therefore, 'violence against women' are generally termed as Gender-Based violence'. Although Gender Based violence focuses on violence against women and girls. It should be remembered that the 'gender-based' aspects highlights the fact that violence against women is an expression of power inequalities between women and men irrespective of time, place and society.

There are lots concepts, statements, definitions etc. for Gender-Based Violence. The leading ones are as follows:

i. Definition of GBV of LGED

GBV is an umbrella term for any harmful act that is perpetrated against a person's will and is based on socially ascribed (i.e., gender) differences between men and women and boys and girls. It includes acts that inflict physical, sexual, or mental harm or suffering, threats of such actions, coercion, and other deprivations.

ii. UN Definition of VAW

The United Nations defines violence against women 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."

"Violence against women" is understood as a violation of human rights and a form of discrimination against women and shall mean all acts of gender-based violence that result in, or are likely to result in, physical, sexual, psychological or economic harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life. (Art. 3a, Council of Europe Convention on preventing and combating violence against women and domestic violence). iii. Gender based violence includes "acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivations of liberty." (CEDAW General Recommendation no. 19 on VAW).

2.2 GBV in Construction Industry: Bangladesh Perspective

In Bangladesh, the social structure is traditionally male governed. On the other hand, there are religious barriers for women and girls in working outside the residence. Working with unknown male laborers and staying at labor camps even having all provisions of social safeguard in place is also not well accepted within the community.

It is an unavoidable fact that women and girls face diverged risks of violence and sexual harassment during the implementation of construction projects/contracts. Women construction laborers are simply vulnerable to sexual harassment and abuse, intensified by the traditionally male working environment. For example, female construction workers in Sylhet city, Bangladesh have described being economically exploited, verbally abused, and sexually harassed, mostly by coworkers or construction supervisors (The World Bank Study, 2017).

Therefore, it can easily be concluded that irrespective of location (city/urban/ village/remote area), category of construction work and project/contract, women laborers experience economic exploitation, Sexual Abuse and Harassment especially from male laborers and supervisors/managers/labor sardars at the construction site.

2.3 GBV: LGED Perspective

2.3.1 At Workplaces

Workplace of LGED belongs to Head Quarter level and Field Level Offices, (namely, Divisional, Regional, District and Upazila). The scenario in the HQ and Field Level are a little different based on the Officer and Staff perspectives.

2.3.1.1 Head Quarter Level

It is a reality that percentage of female staff (including non-revenue and deployed by consultants) is considerably higher than female officers. On the other hand, due to some practical reasons, the percentage of Male officials/Staff is considerably higher than that of female officials/staff.

As mentioned earlier, LGED is the pioneer engineering institution that has initiated quite good numbers of gender friendly interventions promoting LGED's working environment to a national standard irrespective of unit and sector. Nevertheless, there remains the potentiality and measures shall be in place to prevent/address GBV (if any).

2.3.1.2 Field Level

The percentage of female engagement (including revenue and nonrevenue employees) is rather considerably less than Head Quarter Level. Although, quite a few instances have been reported for especially in non-revenue staff outside the workplace (i.e., office, which is beyond the scope of this document), the working environment in workplaces is perfectly in order in context of GBV. However, GBV is a vital issue integrated with the social culture traditionally, especially in case of co-existence of male and female workers (irrespective of time place and person). Therefore, measures/procedures/provisions should be available to prevent/ address potential GBV instances at workplaces.

2.3.2 At Worksites/Construction Sites

The scenario of GBV in worksite/construction sites irrespective of location, Size of contract and implementing agency, GBV is an unavoidable reality. GBV risks are higher in construction sites where large numbers of male laborers/workers are engaged from outside the area. During the construction phase, female laborers/workers are vulnerable to various forms of harassment, exploitation and abuse, aggravated by traditionally-male working environments (For example, research with female construction workers in Sylhet, found that sexual harassment and exploitation were common features of workplace life: Violence against Women and Girls, Infrastructure and Cities: ICED, 2017). The instances of GBV at worksites under LGED contracts are also existing although not in large scale.

3. ADDRESSING GBV GRIEVANCES

3.1 At Workplaces (Offices)

Women irrespective of workplace are vulnerable to GBV. This generally induced from discrimination of power and position. LGED offices are also included within this unavoidable domain. Due to the lower ratio of female officer/Staff to the male Officer/staff the incident of GBV at LGED workplaces (Offices) are not significant right at this moment. The ratio of female Officers/Staff may increase and the incidence of GBV may also increase in course of time. Nonetheless, there remains every potentiality of GBV in current/future perspective. The incidence of GBV at workplaces substantially:

- Affects the mental stability and peace of the victim;
- Hampers natural and normal delivery of routine services;
- Degrades social status due to wide circulation (both formal and informal);
- Affects the performance and ultimately the output and outcome;
- Affects the normal working environment of the organization
- Ultimately affects the name and fame of the organization.

Therefore, it is important and unavoidable to address GBV especially at the workplaces (Offices) of LGED.

3.2 At Construction Worksites/Worksites

LGED is mandated in implementing small to medium category of projects/contracts in all sectors, (namely, Rural, Urban and Water sector activities). The average rate of engagement of female laborers is 7% in LGED contracts. It increases up to a maximum of 16% based on the intensity and size of the contract and the category as well (Study of “STEPs” 2022). The facts that are related and integrated with the female laborers and construction sites/worksites are:

- Irrespective of the size of infrastructure contract/project the worksites where female and male laborers are engaged there often prevails risky environment in terms of GBV with potentiality of affecting community members, workers and service users.
- GBV risks may increase within local communities where there are large numbers of labors/labor influxes of male workers from outside the area;
- Such workers often come without their families and have nonrefundable incomes related to the local community that may induce a risk in terms of sexual harassment, violence and exploitative transactional relationships;
- These risks are higher where workers come into close contact with the local community (For example: on access routes or when living together in remote areas);
- During the construction phase, workers are also vulnerable to various forms of harassment, exploitation and abuse, aggravated by traditionally-male working environments.
- This GBV is committed mostly by coworkers or construction supervisors largely due to gendered stereotypes about the sexual availability of female construction workers;
- Land acquisition that occurs during the construction phase also increases the risks of GBV. Individuals who make decisions about resettlement and compensation can abuse this power to sexually exploit vulnerable community members, such as those in female-headed households.

Therefore, it is important and unavoidable to address GBV especially at the worksites of LGED.

3.3 What are the Benefits of Addressing GBV

Addressing GBV in all of its projects/contracts/worksites especially in construction phase may have the following benefits:

- Improvement in physical and emotional wellbeing of laborers and strengthening in complying tendency of Occupational Health and Safety (OHS) and other related social safeguard issues;
- Assistance in avoiding reputational degradation, financial risks and legal liabilities for LGED, Development Partners and contractors as well (There are examples of canceling funding by Development Partners like World Bank after serious allegations of sexual misconduct and abuse by contractors: Uganda-2015);
- Establishment of relationships and social license to implement even complex projects/contracts in communities irrespective of locality/worksite (This can be ensured from regular interchange of views/discussions/interactions to understand and track GBV risks for the project/contract concerned as well as the effective use of measures to prevent and respond to identified/possible risks);
- Increasing the scope of forming pool of potential laborers that contractors can draw upon including women laborers from nearby communities having lower apparent risk of GBV.

3.4 Risk Factors of GBV at Construction Sites/Worksites

There are considerable numbers of risk factors that can increase the potentiality of GBV at construction worksites. Some of the leading factors are as below:

3.1.1 *Labor Influx*

Existence of Labor influx of temporary (moving) male workers into small and generally rural host communities with limitation of capacity to absorb the sudden increase of laborers;

3.1.2 *Location of Worksites*

Remote locations of worksites having limited access to resources for community people and limited facilities to report GBV incidences and receive support thereby;

3.1.3 *Security Personnel*

Security personnel (irrespective of agency) deployed to provide protection may also become responsible for misuse of their positions and power to commit GBV;

3.1.4 *Poorly Designed Accommodation Facilities*

Poorly designed or maintained accommodation spaces (labor camps/campus) at project sites (*e.g., bad lighting/without lighting facilities in and around grounds and access routes*);

3.1.5 *Engagement of Informal/Casual Laborers*

Informal/Casual laborers may either be more vulnerable to GBV due to lack of contracts or potential perpetrators (*culprits*) may remain unidentified due to lack of checking backgrounds;

3.1.6 Potentiality of Increased Household Tension

Income generating opportunities for women through direct engagement in construction works or indirect employment (*e.g., catering, trading etc.*) whatever may be the case, there remains increased possibility of household tension;

3.1.7 Chances for Community Criticism

The working opportunity at construction sites at the same place with unknown male laborers may create community criticism against women in localities where the social custom is that women should not work outside the home;

4. WHAT TO DO FOR ADDRESSING GBV RISKS IN LGED

4.1 Leadership, Organizational Culture & Monitoring

To address GBV in the workplace (irrespective of Office/Worksite) one of the leading interventions may be ensuring leadership and upgrading/changing organizational culture both in LGED and in contractor's agency/organization as bellows:

4.1.1 Appointing Dedicated and Senior Focal Point

Appointment of dedicated and senior focal points in both LGED and contractors' organization/agencies with responsibility for ensuring proper implementation of commitments and policies to prevent/mitigate GBV risks.

4.1.2 Increasing Women's Representation in Decision-making Level

Increasing women's representation in all levels, giving emphasis to senior and decision-making levels in all engineering, procurement and construction companies/agencies for better understanding, identification of GBV risks and selecting and implementing the preventive/mitigation measures.

4.1.3 Establishing Proper Monitoring & Reporting System

Establishing proper monitoring systems at the highest levels for regular reporting on GBV both in LGED and contractor's organizational level.

4.2 Human Resources (HR) Policy

The rate of engagement of female laborers are increasing gradually throughout the country as a result of increasing infrastructure development (construction) projects. On the other hand, increasing in the rate of literacy of women/girls is resulting developed socio-economic conscience and awareness that influences their engagement in works in all the sectors including construction/development projects. A well-structured and recruiting system/policy may play a vital role in addressing and preventing GBV especially in worksites. Interventions may include the following:

4.2.1 Formulation and Application of HR Policy

- i. Formulation of HR policy (*may be prepared by the contractor and approved by concerned implementing authority of LGED OR May be formulated by LGED and make it compulsory for the contractor to follow with adaptation if necessary*) with provisions for necessary material and others supports including training to encourage male and female applicants;
- ii. Systematic application of recruitment policy to select laborers for engagement, training and other related purposes; and
- iii. Assessing the performance of female laborers and revise the provision to improve female retention and promotion.

4.2.2 Checking Backgrounds and Reference

Ensure checking previous contracts (jobs, if any) and background for all laborers including references from recent past employer (in applicable cases).

4.2.3 Training Programs

Ensuring necessary training programs for laborers as per provision of recruitment policy within the scope of contract agreement;

4.2.4 Monitoring Performances of Security Personnel/Staff

Ensuring training managing and monitoring performances of security personnel/staff appropriately.

4.3 Formulation of Policies and Procedures/Tools

It is utmost important to have necessary policies of the institution concerned (here LGED) and standard procedures/mechanisms/tools to implement and institutionalize them in a practical, professional and appropriate manner. The interventions may result an expected outcome in this connection:

4.3.1 Provisions for prevention/Mitigation/Addressing GBV Risks

Including GBV provision for prevention/Mitigation/Addressing requirements in Codes of Conduct, policies and protocols for contractors, including training on policies and procedures;

4.3.2 Ensuring Public Disclosure and Availability of Documents in Bangla

Ensuring public disclosure, readily availability along with wider accessibility of necessary document like, Policy(ies), Codes of Conduct (CoC), Standard Operating Procedure (SOP) in local language (Mother language of intended users) to all stakeholders including laborers and all groups of people in project areas;

4.3.3 GBV Risk Assessment, ESIA and ESMP

Including GBV risk assessments in key processes along with Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs);

4.3.4 Resettlement Action Plan (in applicable Cases)

Ensuring formulation and implementation of Resettlement Action Plans (RAPs) (where necessary) in case of acquisition of lands and/or expansion/ replacement/reconstruction purposes of structures. In such cases gender dynamics and GBV risks at household and community level shall be taken into account.

4.4 Establishing Grievance Redress Mechanisms and Investigation Procedures

Grievance Redressing Mechanism (GRM) and procedures for investigation of GBV incidences is the leading priority to address GBV irrespective of incidences, severity and categories. Following interventions may result expected output in this connection:

4.4.1 Grievance Reporting and Supporting System

Establishing confidential and easily accessible grievance reporting, referral and support systems for laborers both online and offline;

4.4.2 Grievance Redress Mechanism (GRM)

Establishing safe, confidential and user-friendly Grievance Redressing Mechanisms (GRM) for local communities;

4.4.3 Automated Reporting System

Inclusion of provisions/options for generating reports related to complaint and actions anonymously to facilitate and encourage prevention of GBV risks;

4.4.4 Mapping of Formal Services and Informal Resources

Ensuring arrangements for mapping (By experts/consultants deployed either by LGED or Contractor or solely by LGED/Contractor) of formal services (e.g., healthcare, counselling) and informal resources including women's organizations to support GBV victims.

4.5 Training and Awareness Raising

For successful implementation and institutionalization of any policy/system/ procedure etc. there is no alternative of training for the target group of people. Similarly, making the beneficiaries/target group/stakeholders concerned aware of the issue is the prerequisite for expected/planned success. The following steps can be taken:

4.5.1 Training on GBV

Providing periodic mandatory training on GBV to all laborers including contractors, contractor's representatives, subcontractors (if any) and core suppliers, as well as relevant consultants and Officials/Staff of LGED.

4.5.2 Awareness Raising Campaigns/Programs

Conducting awareness raising campaigns/interventions to share necessary information (such as what is unacceptable behavior and how to report an incident of GBV) to local communities. Engagement of expert organizations/ expertise (e.g., from local women's rights organizations or NGOs working on GBV) may be considered.

4.6 Active Participation of Contractors

Contractors are the main actors in implementing prevention of GBV especially in the worksites. Therefore, for realistic achievement of targeted result from contractor's end, the following interventions may be applied:

4.6.1 Assessment in Bidding Process

Including assessment system of gender and safety risks in bidding process for contractors;

4.6.2 Checking Contractors for Prior Efforts

Examining contractors for prior efforts to address GBV through prevention and response;

4.6.3 GBV Clauses in Contract

Ensuring inclusion of GBV related clauses in contracts (for example, all workers and staff sign codes of conduct).

5. INSTITUTIONAL FRAMEWORK AND AVAILABLE/PLANNED TOOLS/ FACILITIES OF LGED TO HANDLE GBV

LGED is utterly well-framed and capable in addressing all sorts of Grievances including GBV at all level.

The Intuitional framework suggested in approved GRS guidelines are UGRC, DGRC, PGRC, MGRC & LGRC (at 5 levels) whereas that of in GBV-GRM are suggested at several levels such as HQ, Field-Division, Field-Region, Field-District, Field Upazila, Project and Worksite. These are:

HQ Level

- Central Sexual Harassment Prevention Committee (CSHPC)
- HQ Sexual Harassment Prevention Committee (HSHPC)

Field Level - Division

- Divisional Grievance Redress Officer (DGRO)
- Divisional Sexual Harassment Prevention Committee (DSHPC)

Field Level - Region

- Regional Grievance Redress Officer (RGRO)
- Regional Sexual Harassment Prevention Committee (RSHPC)

Field Level - District

- District Grievance Redress Officer (DisGRO)
- District Grievance Redress Committee (DGRC)

Field Level - Upazila

- Upazila Grievance Redress Officer (UGRO)
- Upazila Sexual Harassment Prevention Coordinator (Focal Person)
- Upazila Grievance Redress Committee (UGRC)
- Project Grievance Redress Committee (PGRC)
- Ministry (Level) Grievance Redress Committee (MGRC)

Worksite Level

- Labourer/Worker Grievance Redress Committee (LGRM/WGRM).

5.1 Head Quarter Level

5.1.1 Grievance Redress Officer (GRO)

At LGED Head Quarters head of Project Monitoring and Evaluation (M&E) Unit (Superintending Engineer, M&E) is in-charge as Head GRO of Head Quarters. A web programmer is employed as a full-time associate to assist the Grievance Redress Officer. In addition, a Senior Assistant Engineer is deputed as substitute GRO to monitor grievance management;

5.1.2 Committees/Forums/Policy/Guidelines

There are various committees to assist in Gender Mainstreaming, prevention and management of grievances including GBV instances as follows:

5.1.2.1 Gender and Development Forum of LGED

In order to mainstream gender in the overall activities of LGED, LGED's gender equality strategy and sector-based action plan has been formulated in the light of the "National

Women's Development Policy-2011" of the Government of the People's Republic of Bangladesh. A 25 Member "LGED Gender and Development Forum (LGDF)" has been reconstituted headed by Additional Chief Engineer (Implementation) to assist LGED in implementing the strategy and action plan.

5.1.2.2 Sexual Harassment Prevention Policy

a. The Policy

A draft **Sexual Harassment Prevention Policy (December 2021)** has been developed by LGED. After approval, the Sexual Harassment Grievance Redress Mechanism proposed in this policy will be followed in all LGED offices and workplaces;

b. New & Exceptional Provisions

- i. Potential risk of gender-based violence and sexual harassment in the workplace has been considered;
- ii. Considering all the risk factors like, stigmatization, rejection of the grievance and threats of revenge by the accused etc. (those influence and compels the women to remain silent and make them incapable in submitting complaints), a specialized complaint addressing mechanism is proposed in LGED's Sexual Harassment Prevention Policy;
- iii. This system should be structured and operated in such a way that women have the opportunity to file their grievances unhindered, safely and confidentially;
- iv. In case of development partners funded projects gender-based violence grievance management guidelines of concerned development Partner will be followed as an additional measure.

5.1.2.3 Operating Guidelines for Corporate Grievance Redress System

LGED has formulated Operating guidelines for Corporate Grievance Redress System which is approved by the Chief Engineer, LGED. The Guidelines are now in operation at all levels of LGED. The main objectives/functions of this Guidelines are:

- (a) Early identification, evaluation and resolving grievances related to the activities of LGED.
- (b) Excel in the quality of government service, delivery of services in less time and hassle-free and developing the attitude towards service delivery spontaneously.
- (c) Establish means, institutional arrangements and Grievance redressal mechanisms for beneficiaries, affected individuals, organizations and other stakeholders in all activities to submit grievances or complaints on projects/worksites and services.
- (d) Redress grievances of aggrieved persons (including women) as well as receiving feedback, opinions, suggestions and comments from beneficiaries, victims and other concerned stakeholders including mass people.
- (e) Analyze and collate messages regarding grievances and suggestions and communicate the position and decision of the authority concerned to the opinion/suggestion and information providers.
- (f) Ensure citizens' participation in all activities and projects of the Department; and

(g) Increase the accountability and transparency of LGED to all the stakeholders and beneficiaries.

5.1.2.4 Central Sexual Harassment Prevention Committee (CSHPC)

Central Sexual Harassment Prevention Committee (CSHPC) will be composed of 5 (Five)-members under the chairmanship of Additional Chief Engineer (Planning & Design). The committee will be located at LGED Headquarters and act as the Chief Coordinating and appeal management body. At least two members of this committee will be women.

5.1.2.5 Headquarters Sexual Harassment Prevention Committee (HSHPC)

A seven-member “Head Quarter Sexual Harassment Prevention Committee (HSHPC)” will be constituted at Head Quarters headed by the Superintending Engineer (HR, Environment and Gender) or Additional Chief Engineer (HR, Quality Control and Environment). Majority of the members including the Chairperson or the Member Secretary shall be women.

5.2 Field Level

5.2.1 Divisional Level

5.2.1.1 Divisional Grievance Redress Officer (DGRO)

Additional Chief Engineer in charge of the Divisional Office of LGED shall work as the Divisional Grievance Redress Officer.

5.2.1.2 Divisional Sexual Harassment Prevention Committee (DSHPC)

A 5–7-member (More than 50% of the members will be women)

Divisional Sexual Harassment Prevention Committee (DSHPC) committee will be formed with local representatives and experts along with concerned officers of the Divisional office of LGED.

5.2.2 Regional Level

5.2.2.1 Regional Grievance Redress Officer (RGRO)

Superintending Engineer in charge of the Regional Office of LGED shall work as the Regional Grievance Redress Officer (RGRO).

5.2.2.2 Regional Sexual Harassment Prevention Committee (RSHPC)

A 5–7-member (More than 50% of the members will be women) **Regional Sexual Harassment Prevention Committee (RSHPC)** committee will be formed with local representatives and experts along with concerned officers of the Regional Office of LGED.

5.2.3 District Level

5.2.3.1 District Grievance Redress Officer (DGRO)

Executive Engineer in charge of the District Office of LGED shall work as the District Grievance Redress Officer (DGRO).

5.2.3.2 District Grievance Redress Committee (DGRC)

At district level, a 7 (seven) member District Grievance Redress Committee (DGRC) is constituted with District Executive Engineer of LGED as the chairperson. The structure of DGRC is as follows (Table:5-1):

Table 5-1: Composition of District Grievance Redress Committee (DGRC)

Sl.	Description of Person	Position in Committee	Number	Comment
(1)	Executive Engineer (District), LGED	Convener	1	
(2)	Upazila Engineer, LGED (From own individual Upazila)	Member Secretary	1	
(3)	Class-1 Officer from District Administration	Member	1	
(4)	District Sociologist/ Assistant Engineer	Member	1	
(5)	Local Elite/Representative of Civil Society	Member	2	Nominated by Executive Engineer of the District
(6)	Contractor/Representative of stakeholder	Member	1	Nominated by Executive Engineer of the District
Total=			7	

5.2.4 Upazila Level

5.2.4.1 Upazila Grievance Redress Officer (UGRO)

Upazila Engineer in charge of the Upazila Office of LGED shall work as the Upazila Grievance Redress Officer (UGRO).

5.2.4.2 Upazila Sexual Harassment Prevention Coordinator (Focal Person)

In each Upazila Office of LGED, one officer/staff will be assigned the responsibility of Upazila Gender Based Violence (GBV) Prevention Coordinator (GBV Focal Person). In case of any incident of gender based or sexual violence/harassment, the coordinator in charge (Focal Person) shall assist the concerned office and other field level stakeholders to file grievances at specific places.

5.2.4.3 Upazila Grievance Redress Committee (UGRC)

At Upazila level, a 7 (seven) member Upazila Grievance Redress Committee (UGRC) is constituted with Upazila Engineer of LGED as the chairperson. The structure of UGRC is as follows (Table:52):

Table 5-2: Composition of Upazila Grievance Redress Committee (UGRC)

Sl.	Description of Person	Position in Committee	Number	Comment
(1)	Upazila Engineer, LGED	Convener	1	
(2)	Community Organizer, LGED	Member Secretary	1	
(3)	Member of Local Union Parishad	Member	1	Scheme site under the jurisdiction of the member of concerned Union Parishad

(4)	Teacher of Local Educational Institution	Member	1	Nominated by Upazila Engineer
(5)	Local Elite	Member	1	Nominated by Upazila Engineer
(6)	Representative of Local Women's Organization	Member	1	Nominated by Upazila Engineer
(7)	Affected person or person involved in construction site	Member	1	Nominated by Upazila Engineer
	Total=		7	

5.2.4.4 Project Grievance Redress Committee (PGRC)

Project Grievance Redress Committee (PGRC) shall be established at the level of Project Director's office located at LGED HQ or elsewhere irrespective of financier. The Project Director of concerned project shall administer the PGRC. Meetings of PGRC will be held as required through notice issued by Project Director's office i.e., PMU.

5.2.4.5 Ministry (Level) Grievance Redress Committee (MGRC)

For the ministry, the **Ministry (Level) Grievance Redress Committee (MGRC)** has been established. MGRC is being administered in the leadership of the Secretary of Local Government Division with the assistance of GRO of the Central GRS. Meetings of MGRC is holding/use to hold at the request of Project Director or subject to receipt of grievances or as per Central GRS Guidelines 2015.

5.2.4.6 Accountability of Committees

(a) Central Sexual Harassment Prevention Committee (CSHPC) at Headquarters level shall:

- Be accountable to the Gender and Development Forum (LGDF) and Chief Engineer of LGED; and
- Submit reports on their activities in the prescribed format annually.

(b) All Head Quarters and Field Level Committees namely, Head Quarter Sexual Harassment Prevention Committee (HSHPC), Divisional Sexual Harassment Prevention Committee (DSHPC) and Regional Sexual Harassment Prevention Committee (RSHPC) shall:

- Be accountable to the Central Sexual Harassment Prevention Committee (CSHPC) at LGED Head Quarters; and
- Submit reports on their activities in the prescribed format six-monthly.

5.3 Worksite Level

LGED has meanwhile formulated Operating Guidelines for Corporate Grievance Redress System and it is under practice at all levels of LGED including worksites/Laborers (along with women). In that Guidelines, handling/addressing all sorts/varieties of grievances including GBV has been addressed. It has covered even project (including Development Partners Financed Projects) level grievance redress mechanism along with GOB financed projects/programs/activities in all sectors, (namely, Rural Infrastructure Development, Urban and Small-Scale Water Resources Development Sectors). The summary of provisions for field level GBV is as follows:

5.3.1 Laborers/Workers Grievance Redress Mechanism (LGRM/WGRM)

5.3.1.1 General

Irrespective of working environment, both employers and employees are expected to be integrated with the mutual responsibilities, rights, laws, regulations or employment policies and the requirements and procedures for handling dissatisfactions and grievances thereby.

5.3.1.2 Applicability (General)

Laborers/Workers Grievance Redress Mechanism (LGRM/ WGRM) is applicable for managing grievances or dissatisfactions related to responsibilities, rules of conduct, rights and privileges of employees:

- At construction worksites; and
- Construction workers of contracting agency deployed in any construction work.

5.3.1.3 Applicability (Projects/Programs)

LGED or Head of Program/Project Directors shall administer and supervise the application/implementation of Laborers/Workers Grievance Redress Mechanism for the appointed contractor's own workforce.

In case of projects funded by International Development Cooperation Agencies:

- A Laborers/Workers Grievance Redress Mechanism shall be applicable in the light of their policies and in accordance with the labor laws of Bangladesh;
- The contracting organization shall specify the details of the Worker Grievance Redress Mechanism in its worker management plan.
- Guidelines for the use of established Grievance Redress Mechanism shall be developed and distributed to all employees in a language they understand (i.e., simple Bangali version).

5.3.2 Coverage of Types/Field of Grievances

The Guidelines has covered the following field of grievances:

- (a) Salaries, wages, working hours and overtime;
- (b) Worker accommodation system in construction areas;
- (c) Relationship with mass people of the construction area;
- (d) Code of Conduct and Disciplinary Measures;
- (e) Physical and health risks and treatment measures;
- (f) Provision of general and emergency leave;
- (g) Gender discrimination, assault of women and sexual harassment;
- (h) Personal and Social Security etc.

5.3.3 Ethics followed for Redressing Laborers/workers Grievances

In redressing Grievances (including Gender Based Violence Grievances) of Laborer/workers (including women) ethics have been followed are as bellows:

- (a) *It will be transparent and ensure equal opportunities to all laborers/workers in expressing concerns and filing grievances/ complaints;*
- (b) *Employees (Officer/Staff) should be informed of time, place and person for lodging complaints conforming to their recruitment rules/policies;*

- (c) *The authority (management) concerned will ensure all necessary actions in time to redress all grievances wholeheartedly;*
- (d) *Laborer/Worker related GBV/GRM information regarding the worker must be known to all laborers/workers (direct or appointed) and have access to these information through notice boards, leaflets, handouts etc.;*
- (e) *Anonymous complaints should be dealt with as like as formal complaint if the identity of the complainant is known;*
- (f) *During receiving of grievance, the complainant should be informed about the time frame and procedure for redressal;*
- (g) *No discrimination shall be allowed against any laborer/worker because of the disclosure of grievances;*
- (h) *In applicable cases, grievances must be resolved confidentially;*
- (i) *If any aggrieved laborer/worker becomes dissatisfied with the decision of the LGRC, can have every right to lodge a grievance or appeal to the contracting office (Executive Engineer/Upazila Engineer as applicable);*
- (j) *The Laborer/Worker Grievance Redress Mechanism shall not prevent aggrieved laborers/workers from the opportunity to negotiate or litigate through CBA/Labor Court/Tribunal under Labor Act, 2006.*

5.3.4 Institutional Framework for Redressing Laborers/Workers Grievance

A two-tier Laborer/Worker Grievance Redress Mechanism will be established for satisfactory redressal of grievances of the laborers/ workers employed by the contractor at the construction worksite under any agreement with LGED:

5.3.4.1 1st Tier: Laborer/Worker Grievance Redress Committee (LGRC/ WGRC)

A Laborer/Worker Grievance Redressal Committee (LGRC/ WGRC) shall be formed and operated at construction workplace/ worksites against contract agreement with LGED. The composition of LGRC will be as follows:

Table 5-3: Composition of Laborers/Workers Grievance Redress Committee (LGRC/WGRC)

Sl.	Description of Person	Position in Committee	Number
(1)	Upazila Engineer, Concerned Upazila OR Representative of the Executive Engineer, Concerned District	Chairperson	1
(2)	Sub-Assistant Engineer (in Charge of Supervision of the Contract), Upazila Engineers Office, Concerned Upazila or Field/Supervision Engineer, Design and Supervision Consultants (in applicable cases)	Member Secretary	1
(3)	Representative of the Department of Labor, Nearest Labor Office	Member	1
(4)	Representative of Male Laborers/workers, Concerned Worksite	Member	1
(5)	Representative of Female Laborers/workers, Concerned Worksite (If Applicable)	Member	1
(6)	Construction/Site Manager, Concerned Worksite	Member	1
	Total=		6

5.3.4.2 2nd Tier: Appellate Officer (AO)

(a) In case of Project (Irrespective of Financer):

- The concerned Project Director will act as the second level or Appellate Officer in the Worker Grievance Redress Mechanism.
- If the decision of LGRC/WGRC is not acceptable to the aggrieved laborer/worker (male or female) or group, the member secretary will send the complaint to the project director along with all the documents (Files, Records). This will be treated as an appeal of the aggrieved laborer/worker/group.

(b) In Case of Programs/Centrally Administered Activities:

- The concerned Superintending Engineer (Either LGED HQ or Region) will act as the second level or Appellate Officer in the Laborers/Worker Grievance Redress Mechanism.
- If the decision of LGRC/WGRC is not acceptable to the aggrieved laborer/worker (male or female) or group, the member secretary will send the complaint to the project director along with all the documents (Files, Records). This will be treated as an appeal of the aggrieved laborer/worker/group.

5.3.4.3 Alternative Option

If aggrieved laborers/workers/Group deem justified, may apply for justice in Labor Court or Tribunal.

6. PROCEDURES TO ADDRESS GBV GRIEVANCES AT WORKPLACES (OFFICES OF LGED)

It is now evident that LGED holds readiness enough to address Gender Based Violence (GBV) issues quite comfortably. In the way of successful handling of GBV available tools/apps and facilities i.e., Online GRS Application and necessary operational guidelines can be used optimistically. Similarly, Offline arrangement as mentioned earlier can also be used as per state of applicability and usability. In this chapter the stepwise procedures with divergence of use and application will be outlined.

6.1 Awareness and Training on Grievance Redress System (GRS)

This step is equally important for both workplace (Offices of LGED) and construction worksites. Therefore, it is illustrated combinedly in one sub-section as below:

6.1.1 Ensuring Knowledge of Using GRS and Promotion Materials

In this connection the Prime tasks should be as follows:

- (a) To motivate targeted users and ensure at least minimum knowledge and familiarity about Grievance Redress System (GRS);
- (b) After having familiarity with GRS, the user concerned shall be made fluent about the procedures, especially how to lodge complaints or suggestions online and offline. For this purpose, LGED will:
 - i. Undertake necessary training and awareness raising programs;
 - ii. Prepare related manuals and guidelines and print them in the form of handouts and booklets (prepared meanwhile);
 - iii. Make these printed handouts, booklets etc. open to the mass people in all Divisional, Regional, District and Upazila offices (Distributed and ensured meanwhile);
 - iv. Ensure special arrangements to make these materials/ documents available at the worksites for contractors/ contractors' representatives and laborers/workers in "Bangla" to ensure optimum use;
 - v. GRS handout/manuals and other relevant materials will be kept in stock in central GRS and every Union Information Centre for the use of mass/intended people.



Chart-1: Ensuring Knowledge of Using GRS and Awareness Raising Materials

6.1.2 Training on GRS for Root Level Stakeholders

For expected and optimum output training programs and awareness raising interventions shall be implemented at the root level i.e., at Union/village and the worksites level stakeholders including contractors/contractor representative/laborers/workers. The following tasks LGED will ensure:

- (a) Implementation of training programs on GRS at Upazila level for elected Union Parishad Chairman and members;
- (b) Inclusion of GRS training schedule in LGED's annual training calendar;
- (c) Implementation of training programs at reasonable intervals as per plan;
- (d) Arrangements to include GRS in the training programs of Local Government Institutions (LGIs);
- (e) Arrangements for inclusion of GRS in the curricula of national Local Government Institutions (LGIs);
- (f) Facilitation of regular delivery/sharing of necessary information and procedures of using GRS (both online/offline) to mass people through the elected local representatives.



Chart-2: Training on GRS for Root Level Stakeholders

6.1.3 Special Training for Officers/Staff in charge of Handling GBV Related GRS

Grievances related to Gender-Based Violence and Sexual Harassment are generally sensitive and very risky for the victim to file complaint as well. Therefore:

- (a) Every person (Officer/Staff) in charge of receiving and managing grievances related to GBV should be specially trained;
- (b) “LGED Gender Forum” (preferably) will provide regular training to all committee members as well as all officials-Staff in charge;
- (c) Inclusion of such special training will be ensured by LGED in the annual training program along with sufficient budget.



Chart-3: Special Training for Officers/Staff in Charge of Handling GBV Related GRS

6.2 Basic Mandatory Elements for Successful Application of Redressing Procedure

Before commencing the redressing of GBV grievances it is mandatory to ensure some key elements/arrangements. These are applicable both official workplaces and construction worksites i.e., for laborers/workers. As mentioned in Chapter-5, the Institutional Framework sufficient arrangements are in place for official workplaces. In construction worksites, where women laborers/workers are more vulnerable compared to officers/staff in the official workplace (especially in LGED context), needs functionable facilities/arrangements in place to ensure expected Management of GBV related Grievances. These are as follows:

(a) Means of Receiving Complaints These may include:

- i. Comment/complaint form
- ii. Complaint/Suggestion/Comment/Opinion box;
- iii. E-mail address;
- iv. Mobile (Smart) Phone;
- v. Courier/post (arrangement and Addresses);
- vi. Telephone hotline;
- vii. Online GRS address, etc;

(b) Timescale for Acknowledgement

There should be specific timescales for acknowledging or responding to grievances/ complaints submitted/filed/lodged;

(c) Complaint/Grievance Register

A grievances/Complaints register is mandatory for registration of grievances and monitoring its timely disposal;

(d) Supervising Committee/Officer/Staff/Office

There should be an Office/department/committee/Officer/Staff (as applicable) responsible to oversee the process of receiving, documenting and redressal of grievances; And

(e) Distribution of Documents of GBV redressing procedure

Before commencement of training/construction work, detail of Grievance Redress Mechanism related to GBV shall remain written (**preferably in Bangla**) and must be provided to all laborers/workers.

(f) Appointment of Authorized Representative

It is preferable that an authorized representative of implementing office (the Project Office in case of contracts being implemented under any project irrespective of financing agencies). This is necessary to monitor detailed task/sequential activities/procedures and maintaining proper liaison among contractor Laborer/Worker, PMU/LGED authorities concerned.

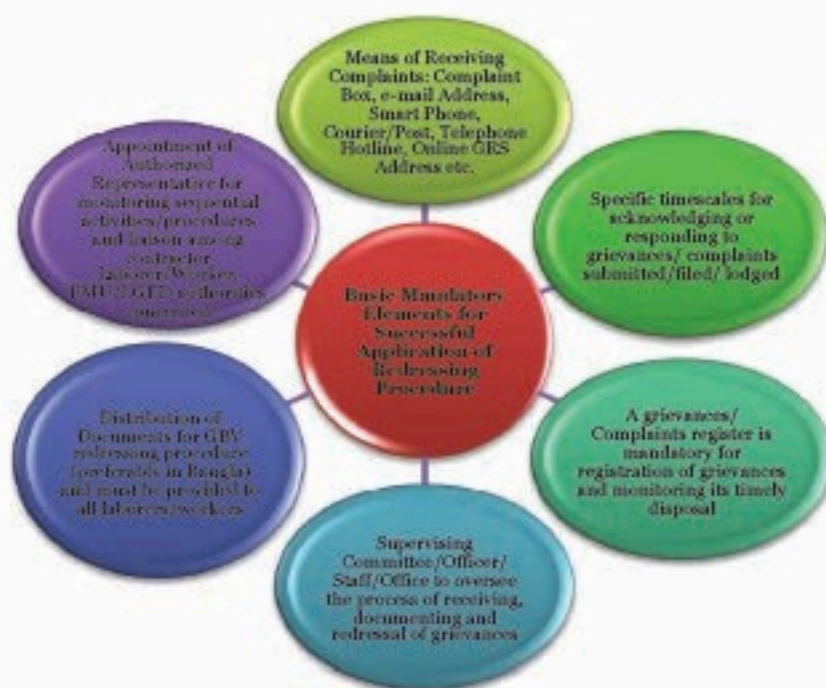


Chart-4: Basic Mandatory Elements for Successful Application of Redressing Procedure

6.3 Sequential Procedures for Addressing GBV Grievances at Workplaces (Offices of LGED)

The procedure and sequences of redressing GBV grievances is different for workplaces (offices) and construction worksites. Therefore, the procedures have been presented separately to facilitate the application effectively and optimistically without any confusion.

6.3.1 Filing, Receiving and Resolving GBV related Grievances

Sequential procedure for receiving and resolving GBV related grievances at the workplaces (offices of LGED) is illustrated as bellows:

6.3.1.1 Filing/submitting/lodging GBV Related Grievances

- (a) The victim (officer/Staff) of Gender Based Violence (GBV) i.e., Sexual Harassment (SH)/Sexual Abuse (SA)/Sexual Exploitation (SE)/Sexual Exploitation and Abuse (SEA) etc. after experiencing the GBV instance shall (preferably) warn/alert the accused (Officer/Staff);

- (b) If the accused (Officer/Staff) holds a higher position, it will be troublesome to directly warn him in this connection. In such case, the victim (Officer/Staff) shall preferably take help of Focal Person/Point concerned; OR
- (c) Victim shall file/submit/Lodge the complaint to the next higher-level office responsible for receiving grievances; OR
- (d) The victim (Officer/Staff) shall submit complaint to any member of the 'Sexual Harassment Prevention Committee' applicable as per following table (Table-6:1) of hierarchy:

Table 6-1: Hierarchy of SHPC for Submitting GBV Grievances

Sl.	Office of Victim (Officer/Staff)	Level of Sexual Harassment Prevention Committee (SHPC) for Submission of Grievances
1.	Office of the Upazila Engineer, (Upazila Concerned)	Regional Level SHPC, (Region Concerned)
2.	Office of the Executive Engineer, (District Concerned)	Regional Level SHPC, (Region Concerned)
3.	Office of the Superintending Engineer, (Region Concerned)	Divisional Level SHPC, (Division Concerned)
4.	Any Unit under LGED Head Quarters	Head Quarter SHPC OR Central SHPC

- (e) The victim (Officer/Staff) may submit complaint any format mentioned below as s(h)e feels comfortable:
- Through Online Grievance Redress System (GRS) website either by name or anonymously.
 - In writing
 - Through e-mail;
 - Over telephone hotline; OR
 - Verbally (Orally).

In case of written submission, s(h)e shall preferably use the standard form (Form-A) for submission of complaints illustrated in the Annexure:

- (f) The victim (Officer/Staff) must file/submit/lodge the grievance within 30 days of the occurrence of the incident;
- (g) Reliable representatives (like Colleagues, friends or relatives) of the victim (Officer/Staff) may file/submit/lodge a complaint/grievance having written consent of the victim;
- (h) In case of filing/submitting/lodging GBV related complaints the victim (Officer/Staff) shall preserve the proof of consent.



Chart- 5: Procedure for Filing GBV Related Complaints at Workplace (Offices of LGED)

6.3.1.2 Receiving and Registering Submitted/Filed/Lodged GBV Grievances/ Complaints
 Sequential procedure for receiving and registering GBV related grievances at the workplaces (offices of LGED) is illustrated as follows:

- (a) A complaint/opinion box shall be placed at a safe location at all offices of LGED including Headquarters with identifying marking/tag to facilitate dropping of grievances without any hesitation;
- (b) Victim/intended person who desires to file/submit/lodge a grievance with confidentiality shall drop his/her complaint in the complaint/ opinion box;
- (c) This box will be opened at least once a week only by a designated and trained person experienced enough in maintaining necessary confidentiality;
- (d) Complaints submitted vide online GRS portal shall be forwarded by the central Focal Person/Point/Grievance Redress Officer (GRO) to the Grievance Redress Officer (GRO) of concerned division/Region/ District/Upazila for onward action;
- (e) All level Committees of (Head Quarter/Division/Region/Upazila) shall appoint preferably its member secretary on front duty to receive all grievances including those forwarded vide online GRS portal;
- (f) S(h)e will initially evaluate all the complaints submitted verbally, written, online and in the box and present them before the committee concerned;
- (g) If it becomes evident that the accused person is included in the committee (Chairperson/member), then the complaint shall be submitted to the immediate higher committee/higher office (as applicable);

- (h) During such submission, the person in charge of receiving/registering/ primary scrutiny of the complaints shall inform the issue to the responsible person of immediate higher committee/office maintaining all confidentiality;
- (i) If the victim comes in person to file an oral or written complaint, the person responsible for receiving/registering/primary scrutiny of the complaints shall not ask for any information or record the complaint except:
- The type/category of complaint (complainant's statement in her/ his own words without questioning directly);
 - Whether the accused is any officer/staff of LGED (Revenue/ Nonrevenue) (To the best knowledge of the complainant);
 - The gender and age (If possible) of the complainant;
 - Whether the victim is linked to any specialized service center



Chart- 6: Receiving and Registering Submitted GBV Grievances

6.3.1.3 Sequential Steps After Receiving Complaints

Sequential procedure after receiving and registering GBV related grievances at the workplaces (offices of LGED) are illustrated as bellows:

- i. The GRO/Focal Point shall record (written/Audio) the actual events including place, time and date;
- ii. Authentication of the complainant regarding filing of the grievance shall be verified;
- iii. Written consent of the complainant regarding filing of the complaint shall be obtained;
- iv. The complainant shall be informed of the formal processes of complaint including onward steps so as to assist him/her in deciding whether s(h)e will file a formal complaint or not;
- v. The GRO/Focal Point shall be clear about the perspective of expected outcome of the complaint filed by the victim;
- vi. The decision of the victim regarding formal complaint shall be honored;
- vii. The victim/complainant shall be informed of the alternate legal and appropriate venue for filing/submitting/lodging complaint so as to allow her/him using alternate venue as per her/his desire;

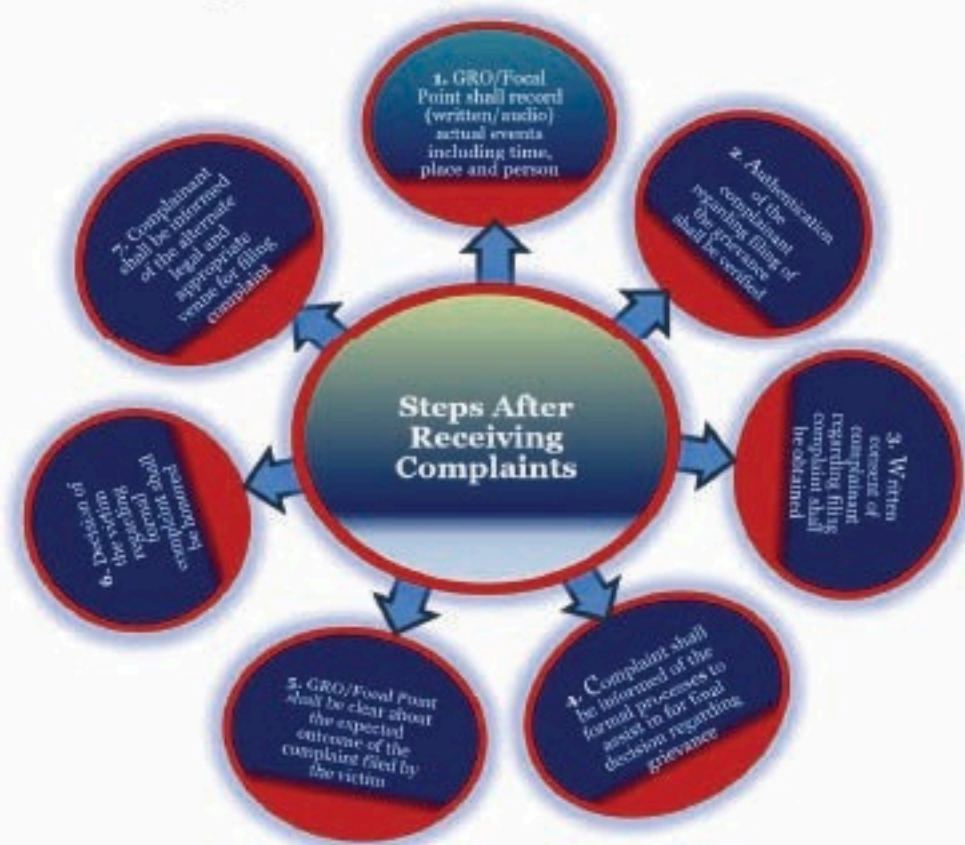


Chart-7: Sequential Steps After Receiving Complaints

6.3.1.4 Scrutinizing the Complaints Before Selection for Investigation

After receiving the complaint, and performing the primary checking (as per Sub-section 7.3.1.3 of this chapter) GRO/Focal Point (Person) concerned shall scrutinize the grievances based on the following facts/features:

- i. Whether the service standards described in the Citizen's Charter have been violated in case of grievance submitted;

- ii. Whether there is sufficient element of activities violating rules related to Standard Gender provisions that has been provide to the victim as described in the grievance;
- iii. Whether the grievance contains sufficient elements of misconduct in in relation to GBV;
- iv. Whether the complainant has full address, phone, e-mail etc.;
- v. Whether the grievance contains sufficient information regarding issue of grievance as to what the complainant seeks redressal;
- vi. Whether the grievance has been filed in accordance with the instructions mentioned by the victim/institution/ nominated representative; And
- vii. Whether the grievance is filed anonymously; viii. If a grievance is filed anonymously, GRO will take appropriate steps whether the grievance will be acted upon or not according to the nature/seriousness/merit of the grievance;
- viii. After such scrutinization, GRO will take action to redress the grievance through appropriate steps subject to the approval of authority concerned;
- ix. The issue shall be placed before concerned committee for decisions regarding formal enquiry;
- x. Before/during investigation and redressing process LGED shall:
 - Provide counselling support to the victim;
 - Train required number of officers/staffs at headquarters and field level to ensure provision for psychological support to GBV victims.

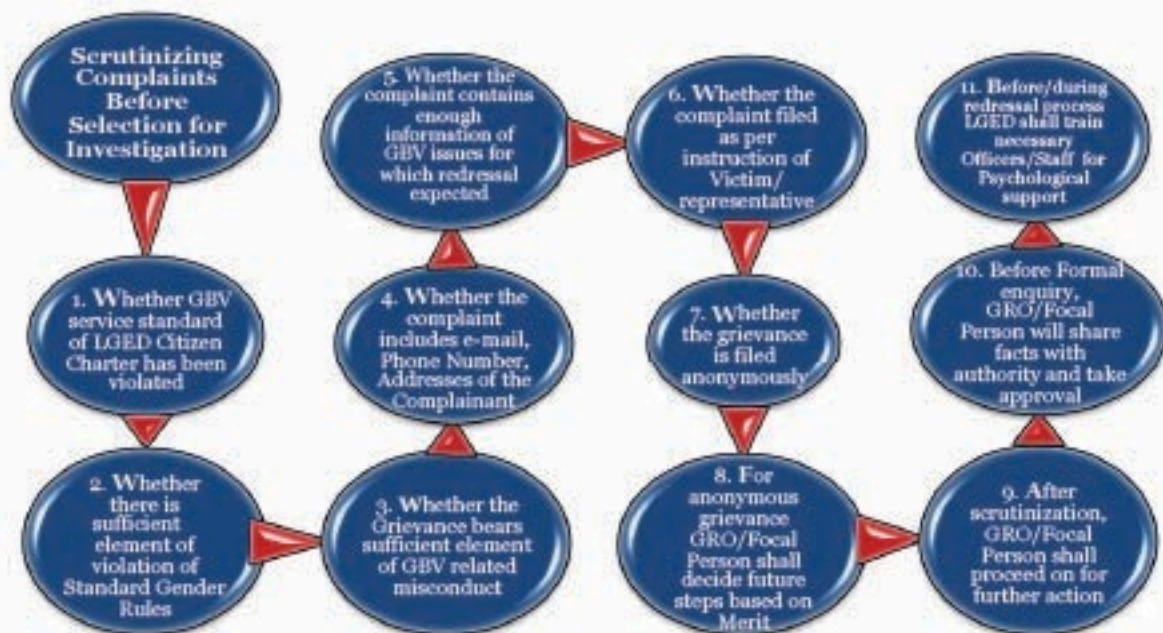


Chart- 8: Scrutinizing Complaints Before Selection for Investigation

6.3.1.5 Procedure of Investigation

Once it is decided that the complaint will be investigated, GRO/Focal Person/other Officer/staff (as applicable as per following provisions) shall undertake the necessary steps for completion of the investigation as follows:

- i.* The authority for approving the investigation shall also approve/appoint the Investigation Officer (IO) based on the category, merit and severity of occurrence of GBV;
- ii.* The IO may be the GRO /Focal Person Concerned/ Other Officer/Staff as the authority seems fit and justified;
- iii.* The IO (preferably) be Female officer/Staff so as to make the victim easy and free, relaxed, confident and cooperative in the whole investigation and redressing process;
- iv.* In case of unavailability of Female Investigating Officer, Grievance Redress Committee (GRC) concerned may take initiatives to select GBV activist (individual/serving in NGO) for the field level complaints;
- v.* For Headquarter level complaints, Gender and Development Forum (GDF) shall appoint female.
- vi.* Investigating Officer either from LGED or following the similar process of “Clause-vi” of this sub-section;
- vii.* In any case, if male officer/staff is decided to be appointed as Investigating Officer (IO) it will be wise and preferable to have consent form the victim before appointment to ensure expected outcome of investigation;
- viii.* General hierarchical eligibility for appointing GRO/ Focal Person shall be as follows:
 - If the accused officer/staff concerned is subordinate to GRO in the rank, he will be eligible for undertaking investigation subject to the approval of his Controlling Authority;
 - If the accused officer/staff concerned belongs to equal or superior position than that of the victim, the IO shall be of Higher Position subject to the approval of controlling Authority concerned;
 - GRO can assign (arrange) the responsibility of investigation to an officer (with consent) holding at least one step higher position than that of the victim;
 - GRO may form an investigation committee composed of not more than 3 (three) members with at least 1 (one) female member in any position;
- ix.* The Investigation Officer/ Committee shall complete the investigation process and submit investigation report not more than 20 (Twenty) working days from the date of formal appointment.



Chart- 9: Procedure for Investigation

6.3.1.6 Disposal of Grievance

As there are two types of submission facilities for grievances, the process of disposal and communication/sharing of subsequent steps after investigation and redressal are also different categorically. These are as follows:

i. Grievances Submitted/Filed/Lodged Offline

- a. The concerned authority, based on the recommendations of the Investigation Officer/ Committee:
 1. May dispose of the complaint;
 2. Take necessary administrative actions (if recommended any by the IO/ Committee);
 3. Inform the victim through letters/ other media issued/arranged by GRO/Focal Person;
 4. May change the IO and arrange for reinvestigation it is deemed justified.
- b. Whatever may be the decision taken by the authority concerned after investigation, GRO/ Focal Person shall inform the complainant through letter or any other suitable media acceptable by both the parties (GRO/Focal Person & Victim/complainant).

ii. Grievances Submitted/Filed/Lodged Online Through Central GRS/LGED GRS Web portal

For grievances submitted online GRS Portal either central or LGED web portal the procedure is automated. These steps are as follows:

- a. There is option for the victim/complainant to check the status of redressal of complaint and updated information through logging on into the GRS site to his/her own interface for complaint.
- b. The disposal/decision of the authority concerned will be displayed in the “Redress” interface on the central GRS website;
- c. GRS system will automatically communicate the information to the complainant/victim regarding the decision taken by authority on the grievance via SMS to the designated cell phone;
- d. However, details of grievance redressing activities/steps, investigation/decision etc. shall remain available on GRS website.
- e. The victim/complainant can view updated information through logging on into the GRS site to his/her own interface for complaint.

6.3.1.7 Appeals Against Decisions of GBV Grievance Redressing

It is not likely that all the decisions of authority against all the grievances related to GBV shall satisfy the victim/complainant and accused always. There may have lots of reasons with extreme divergence. Therefore, there should be a corridor to explore legal and valid alternate options both for the victim/complainant and the accused (i.e., option of appealing) for satisfactory redressal. The steps are as follows:

i. Submission/filing/lodging Appeal Using Offline Media

If any grievance has been filed using offline mode (as mentioned in Cause:6.1.1) other than Central GRS the victim/complainant/accused:

- a. After being dissatisfied after initial disposal, can appeal for review/reinvestigation against the decision taken and disclosed;
- b. The victim/complainant/accused in such cases shall file an appeal to the authority immediately higher than the authority where the grievance has initially been submitted/filed/lodged. The following table illustrates the submission procedure as per hierarchy:

Table 6-2: Hierarchy of Office/Level of Authority for Submission of Appeal

SN	Office of Victim (Officer/Staff)/Accused	Office/Level of Authority for Submission of Appeal
1.	Office of the Upazila Engineer, (Upazila Concerned)	Office of the Executive Engineer, (District Concerned)
2.	Office of the Executive Engineer, (District Concerned)	Office of the Superintending Engineer, (Region Concerned)
3.	Office of the Superintending Engineer, (Region Concerned)	Office of the Additional Chief Engineer, (Division Concerned)
4.	Office of the Additional Chief Engineer (Division Concerned)/ Any Unit under LGED Head Quarters	Office of the Chief Engineer, LGED Head Quarter

- c. For submission/filing/lodging appeal the appellant shall preferably use the form (FORM B: Appeal Submission Form) illustrated in the Annexure:

d. Successive levels of filing Appeal shall be as follows:



Chart-10: GBV GRS: Successive Levels of Filing Appeal

ii. Submission/filing/lodging Appeal Using GRS/Online Media

The procedure of filing/submitting/lodging appeal using online media (Central GRS/LGED GRS Web portal) is as follows:

- a. Using the Central GRS Web portal, a victim/ complainant/accused can appeal against the decision taken by the authority against any grievance;
- b. After initial resolving of any grievance and transmission of auto notification to the victim/ complainant/accused SMS to concerned mobile phone/e-mail the appeal can be lodged;
- c. Option for submitting/filing/lodging an appeal remains valid even after the decision/actions taken has been recorded/registered;
- d. The appellant shall use (click) the [Appeal] button in the GRS window to process for submitting/filing/lodging an appeal;
- e. After submission of appeal by the appellant, the authority concerned shall arrange for necessary steps like reinvestigation if it is deemed justified;

- f. The total process of appeal shall be completed and disposed of within 30 (Thirty) calendar days.



Chart-11: Redressing GBV Grievances at Workplaces (Offices of LGED)

7. PROCEDURE FOR ADDRESSING GBV GRIEVANCES AT CONSTRUCTION WORKSITES

7.1 Awareness and Training on Grievance Redress System (GRS)

7.1.1 Ensuring Knowledge of Using GRS and Promotion Materials

Activities/procedures under this sub-section is described in **Sub-section: 6.1 (6.1.1) of Chapter-6** of this document.

7.1.2 Basic Preparedness Before Submission/Filing/Lodging Complaints

As mentioned in Sub-section 6.2 (a-f) as basic mandatory elements to be ensured before filing/receiving registering complaints shall be ensured. In addition, the following arrangements, elements, establishments shall be ensured before commencing the process of redressal:

- (a-f) Explained in Sub-section 6.2 of Chapter-6 of this document;
- g. Ensuring signing approved Code of Conduct (CoC) by both the contractor and the implementing agency (office/authority) of LGED as a part of contract document;
- h. Making the approved Code of Contract (CoC) available in easy understandable Bangla at worksites for rapid acceptability of laborers/workers;
- i. Laborers/workers, contractor's representative, site managers/labor sardars etc. shall be given extensive orientation on the Code of Conduct (CoC) including merits of complying and demerits of noncomplying with it;
- j. Formation of Laborers/Workers Grievance Redressing Committee (LGRC/WGRC) as per composition structure as described in table- 5.3 (Sub-section: 5.3.1, Chapter-5 of this document);
- k. In case of contracts under any project irrespective of financier, appointment of Grievance Redress Officer (GRO)/Focal Person for receiving/ registering/ handling GBV grievances;
- l. Selection/Finalization of Second Level i.e. the Appellate officer. The Appellate officer may/will be:
 - i. The Project Director for contracts under any project irrespective of financier;
 - ii. Officer with same or higher rank for programs/projects/activities administered centrally by LGED.

7.1.3 Filing, Receiving and Resolving GBV related Grievances

Sequential procedure for receiving and resolving GBV related grievances at the construction worksites is illustrated as bellows:

7.1.3.1 Filing/submitting/lodging GBV Related Grievances

- (a) The victim (Laborer/Worker) of Gender Based Violence (GBV) i.e., Sexual Harassment (SH)/Sexual Abuse (SA)/Sexual Exploitation (SE)/Sexual Exploitation and Abuse (SEA) etc. after experiencing the GBV instance shall have the right to submit grievance;
- (b) The victim (Laborer/Worker) may submit **complaint/suggestions/Opinions** in any format mentioned below as s(h)he feels comfortable:
 - Through Online Grievance Redress System (GRS) website either by name or anonymously.
 - In writing

- Through e-mail;
- Over telephone hotline; OR - Verbally (Orally).

- (c) Victim laborer/worker shall file/submit/Lodge the complaint to the coordinator or member secretary of LGRC/WGRC if;
- i. Any violation occurs; OR
 - ii. likely to occur due to: Any disruption in obtaining the rights as per provision of:
 - Recruitment Policy of the contractor;
 - Code of Conduct (CoC) signed as part of agreement;
 - Prevailing Labor laws and Regulations (as applicable for LGED especially for GBV at construction sites);
 - Labor Policy of LGED (if any); OR
 - National Labor Policy (as applicable for LGED especially for GBV at construction sites);
- (d) In case of written submission, s(h)e shall preferably use the standard form (Form-C in Bangla) for submission of complaints as illustrated in the Annexure:
- (e) If the victim/complainant is not educated enough to write the complaint/fill up the complaint form by herself/himself, then the responsible officer/GRO/Member Secretary of LGRC/WGRC shall fill the form with all confidentially;
- (f) The filled-up complaint form shall be read fully to the complainant/ victim to her/his best satisfaction with full confidentiality;
- (g) For female victim/complainant if she doesn't feel comfort to disclose the subject matter or information of the GBV grievance to male GRO/ Focal Person/Officer in-Charge, then female member of the committee shall cooperate all the way in filling and submitting the complaint with all confidentiality;
- (h) If the complainant seems reliable, s(h)e can make the grievance reached directly to the Project Director with the assistance of GRO/ Focal Person/Officer in-Charge;
- (i) Complainant/Victim can also submit his/her grievance or suggestion through other means like - complaint box, post, email, even on feedback page of LGED or central GRS portal.
- (j) The victim/complainant can file the grievances using LGED web portal/Central online GRS if s(h)e desires, like or fill comfort/ confident;
- (k) In case of filing grievances online, detail information like:
 - Name of the project/Program;
 - Name of the Project Director/Program in-charge
 - Name of contract package;
 - Name of contractor etc. should be provided.
- (l) The GBV grievance for Laborers/Workers received online will be checked by the office of GRO in-charge at LGED Head Quarters and will be sent to the responsible GRO/ Focal Person/Officer in-Charge for necessary action.

7.1.3.2 Steps After Receiving Complaints

Sequential procedure after receiving and registering GBV related grievances at the construction worksites are illustrated as bellows:

- i. The GRO/Focal Point/Officer in-charge as appointed by the Project Director/Program in-charge/Competent Authority shall record (written/ Audio) the actual events of grievance including place, time and date;
- ii. The GRO/Focal Point/Officer in-charge shall:
 - Verify the authentication of the complainant regarding filing of the grievance;
 - Obtain written consent of the complainant regarding filing of the complaint;
- iii. The complainant shall be informed of the formal processes of complaint including onward steps so as to assist him/her in deciding whether s(h)e will file a formal complaint or not;
- iv. The GRO/Focal Point/Officer in-Charge shall become clear about the expected outcome of the complaint filed by the victim;
- v. The decision of the victim regarding formal complaint (positive or negative) shall be honored;
- vi. The victim/complainant shall be informed of the alternate legal and appropriate arrangements for filing/submitting/ lodging complaint so as to allow her/him using alternate them as per her/his desire;



Chart- 12: Steps After Receiving Complaints at Construction Worksites

7.1.3.3 Scrutinizing the Complaints Before Selection for Investigation

After receiving the complaint and performing the primary checking GRO/Focal Point (Person)/Officer in-Charge concerned shall scrutinize the grievances based on the following facts/features, whether:

- i. *The provisions as described in the approved Code of Conduct (CoC) have been violated in case of submitted grievance;*

- ii. *The grievance contains sufficient points of GBV related misconduct and/or violation of rules related to Standard Gender provisions;*
- iii. *The complainant has provided full address, phone, e-mail etc.;*
- iv. *The grievance contains sufficient information regarding issue of grievance as to what the complainant seeks redressal;*
- v. *The grievance has been filed as per instruction/ information provided by the victim/nominated representative;*
- vi. *The grievance is filed anonymously;*
- vii. *For anonymous grievance, GRO will take appropriate steps whether the grievance will be acted upon or not according to the nature/seriousness/merit of the grievance;*

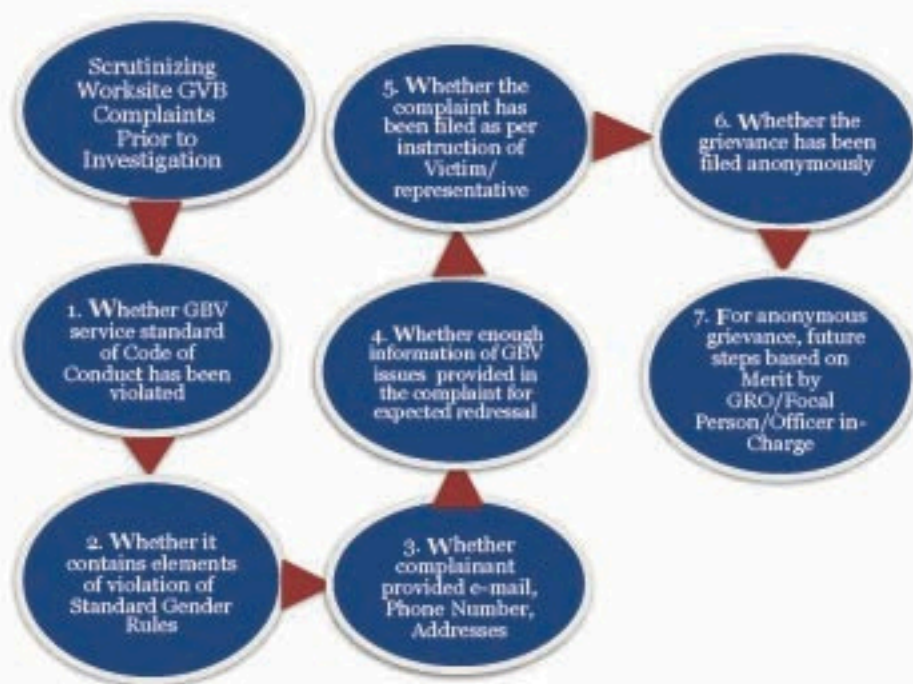


Chart- 13: Scrutinizing Worksite GBV Complaints Prior to Investigation

7.1.3.4 Steps After Scrutinization of Complaints Before Investigation

After such scrutinization:

- i. GRO/Focal Point (Person)/ Officer in-Charge concerned will take necessary action to redress the grievance through appropriate steps subject to the approval of authority concerned;
- ii. The issue shall be placed before concerned committee for decisions regarding formal enquiry;
- iii. Before/during (as applicable) investigation and redressing process the contractor in coordination with LGED shall:
 - Provide counselling support to the victim;

- Train required number of employee to ensure provision for psychological support to GBV victims at the construction worksites.

7.1.3.5 Procedure of Investigation

Once it is decided that the complaint will be investigated, GRO/Focal Person/Officer-in-Charge (as applicable as per following provisions) shall undertake the necessary steps for investigation of the complaint as follows:

- The authority for approving the investigation shall also approve/appoint the Investigation Officer (IO) based on the category, merit and severity of occurrence of GBV instance;
- The IO may be the GRO /Focal Person Concerned/ Other Officer/Staff/Member of LGRC/WGRC as the authority seems fit and justified;
- The IO (preferably) be Female officer/Staff/Member of LGRC/WGRC so as to make the victim (especially female laborers/workers who are comparative less educated/ uneducated) easy and free, relaxed, confident and cooperative throughout the whole investigation and redressing process;
- In case of unavailability of Female Investigating Officer, LGRC/WGRC shall take initiatives to appoint female IO form LGED/ NGO (Preferably GBV related NGO) subject to the approval of competent authority (Preferably, Project Director/Program in Charge);
- In any case, if male IO is decided to be appointed, it will be wise and preferable to have consent form the victim and accused before appointment to ensure expected outcome of investigation;
- The Investigation Officer (IO)/ Committee shall complete the investigation process and submit investigation report not more than 15 (Fifteen) working days from the date of formal appointment.

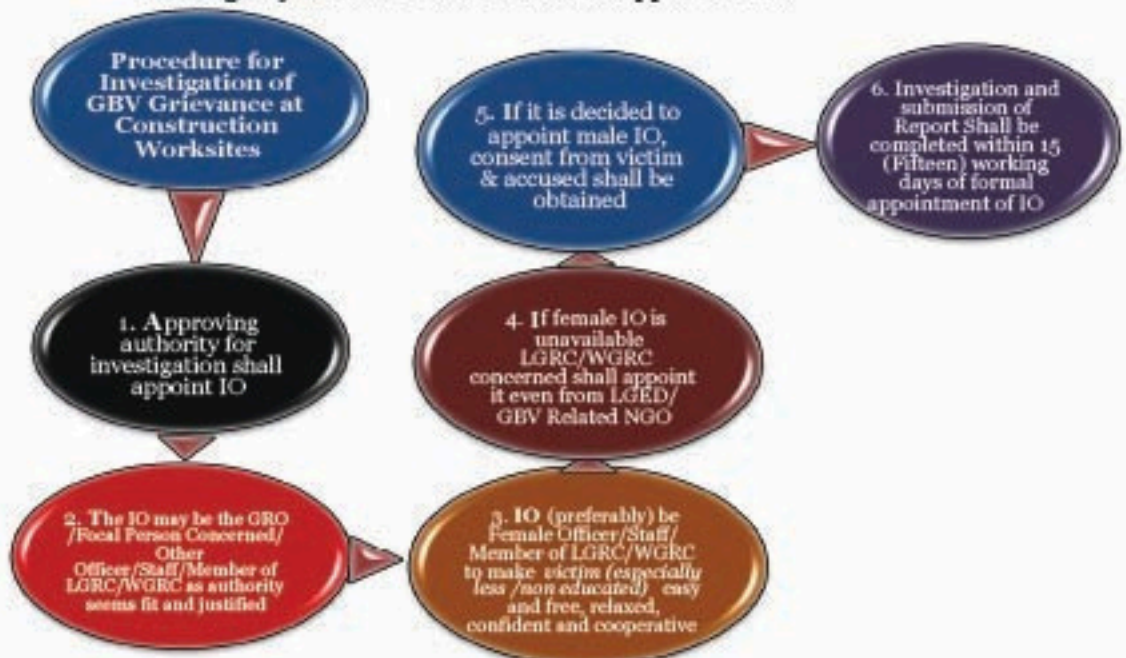


Chart- 14: Procedure for Investigation of GBV Grievance at Construction Worksites

7.1.3.6 Disposal of Grievance (at Construction Worksites)

Based on the mode of submission/filing grievances, the process of disposal and communication/sharing of subsequent steps after investigation and redressal are different. These are as follows:

i. Grievances Submitted/Filed/Lodged Offline

- a. Based on the recommendations of the Investigation Officer the Chairperson/Member Secretary of LGRC/WGRC/ Officer-in-Charge may:
 1. *Dispose of the complaint;*
 2. *Take necessary administrative actions against contractor/accused (if recommended any by IO);*
 3. *Inform the victim through letters/ other media issued/arranged by concerned Person of LGRC/WGRC;*
 4. *Change the IO and arrange for reinvestigation if it is deemed justified by LGRC/WGRC the authority.*
- b. Whatever may be the decision taken after investigation, Person-in-Charge of LGRC/WGRC shall inform the complainant through letter or any other suitable media acceptable by both the parties (LGRC/WGRC & Victim/ complainant).

ii. Grievances Submitted/Filed/Lodged Online Through Central GRS/LGED GRS Web Portal

For grievances submitted online GRS Portal (either central or LGED web portal) the procedure is automated. These steps are similar as mentioned in **6.1.3.6-ii of Chapter-6** of this document.

7.1.3.7 Appeals Against Decisions of GBV Grievance (at construction worksites) Redressing

There is every possibility that all the decisions against grievances related to GBV shall satisfy the victim/complainant and accused always. Therefore, there are legal and valid alternate options (option of appeal) for both the victim/complainant and the accused for satisfactory redressal. The steps of appeal are as follows:

i. Submission/filing/lodging Appeal Using Offline Media

If any grievance has been filed using offline mode (as mentioned in Cause:7.3.1.1) other than Central GRS the victim/complainant/accused:

- a. After being dissatisfied with initial disposal by LGRC/WGRC, can appeal for review/ reinvestigation against the decision taken and disclosed thereby;
- b. In such cases the party concerned (victim/complainant/accused) shall file an appeal to the Project Director/Program in-Charge.
- c. If the appellant is not satisfied with the decision of appellate officer s(h)e can file further appeal to the successive levels as per following Table (Table-7-1):

Table 7-1: Successive Levels of Appeal for Worksite GBV Grievances

<i>Sl</i>	Level of Appeal	Level of Satisfaction	Successive Level of Appeal (If Applicable)
1.	Project Director/Program inCharge	Satisfied	Not Applicable
		Not Satisfied	Chief Engineer, LGED
2.	Chief Engineer, LGED	Satisfied	Not Applicable
		Not Satisfied	Secretary, Local Government Division
3.	Secretary, Local Government Division	Satisfied	Not Applicable
		Not Satisfied	Labor Court
4.	Labor Court	Satisfied	Not Applicable
		Not Satisfied	Labor Tribunal

d. For submission/filing/lodging appeal, the appellant shall preferably use the form (FORM-D: Appeal Submission Form) illustrated in the Annexure:

ii. Submission/filing/lodging Appeal Using GRS/Online Media

The procedure of filing/submitting/lodging appeal using online media (Central GRS/LGED GRS Web portal) is similar to that illustrated in 7.1.3.7 of Chapter-7 of this document.

e. The total process of appeal shall be completed and disposed of within 30 (Thirty) calendar days (except the levels higher/beyond control of LGED, i.e., Local Government Division, Labor Court, Labor Tribunal).



Chart- 15: Successive Levels of Appeal (GBV at Construction Worksites)

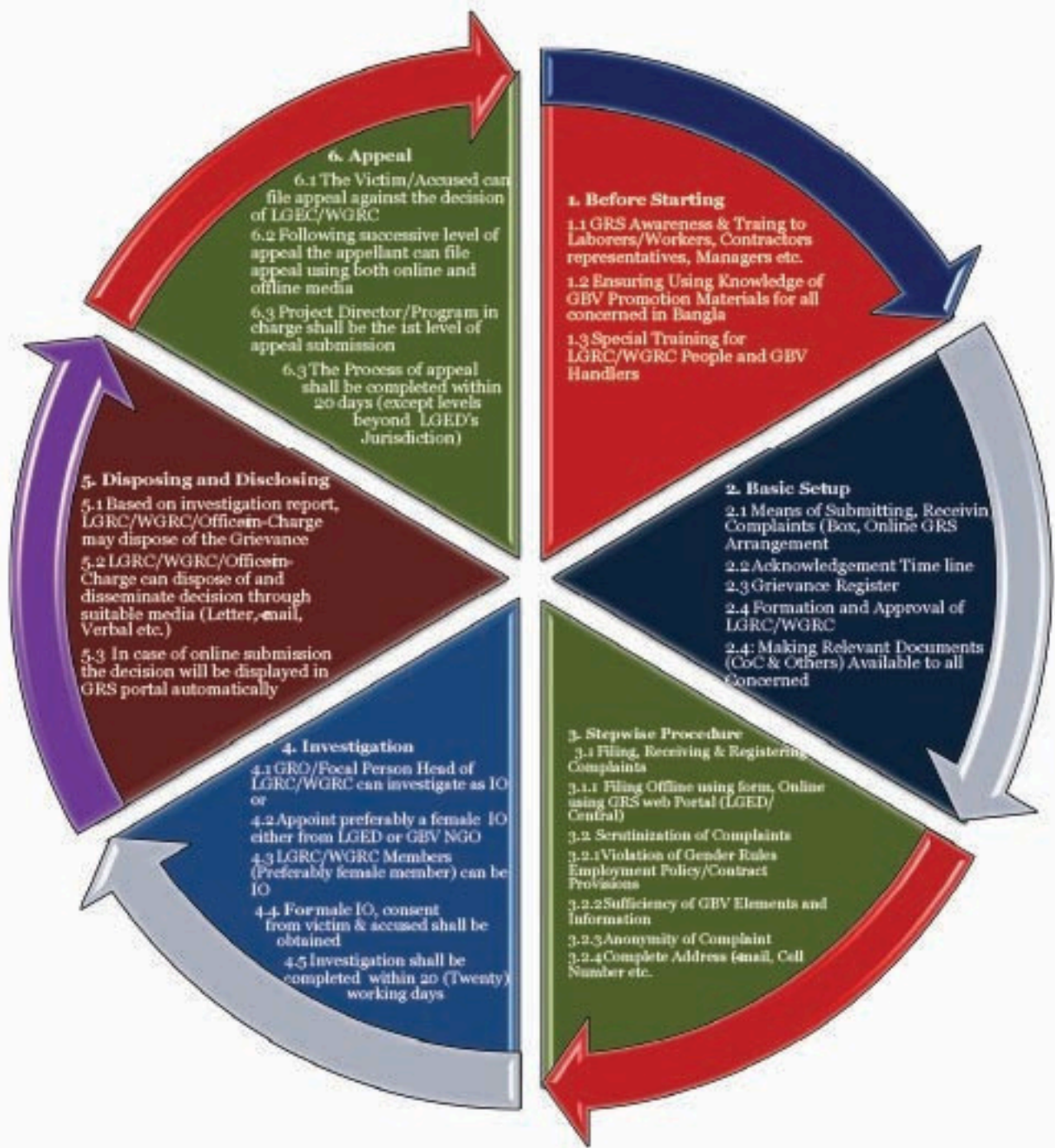


Chart- 16: Sequential Procedure for GBV Redressing (Construction Worksites)

8. TOOLS /FACILITIES AVAILABLE/PLANNED IN LGED TO ADDRESS GBV

8.1 Tools/Apps for Addressing GBV in LGED

8.1.1 Central Grievance Redress System

LGED has both online and offline arrangements for receiving, processing, disposing grievances from aggrieved citizens irrespective of genre. There remains online Central Grievance Redress System (GRS) being operated nationally and administered by the Cabinet Division. The Central Grievance Redress System (GRS) is an open platform for people's participation to improve the quality of civil services to be provided by various government offices. This will facilitate ensuring the quality and timely implementation of the activities undertaken for the welfare of mass people. Figure (Figure-1) shows the homepage of online central GRS (address: www.grs.gov.bd).

In this website, Citizens':

- Grievances related to activities and services of government, semi-government or autonomous organizations can be filed online for redressal.
- Internal grievances regarding facilities and rights of officers and staff of all government organizations submitted here for redressal.



Figure-1: Central Grievance Redress System

- Complaint or opinion for himself or on behalf of someone known to him (phone) anyone can submit a to the central GRS Using simply a smart phone (cell Phone) from any location of the country.

8.1.2 Grievance Redress System of LGED

Grievance Redress System (GRS) of LGED is a participatory system and a tool to ensure redressing grievance and receiving suggestions of citizens and stakeholders as well. The tool is capable of dealing with environmental and social risks and affects, social inclusion, gender disparity, harassment and violence to women, labor and employee hazards, child labor, forced labor etc. including procurement of development works, qualitative standard, land acquisition and rehabilitation.

8.1.3 Comment/Complaint Window of LGED

LGED has a "Comments/Complaints" menu on its own website for submitting complaints and opinions related to the interests of beneficiaries and other stakeholders of country-wide activities. Using this portal:

- People can submit their comments, opinions, suggestions or complaints directly on this site;

- Complaints can be filed through e-Nothi and even through central GRS using this same interface.

LGED's own website has three portals for filing complaints online under the "Comments/Complaints" menu.

For example:

- (1) Comment/ Opinion/ Suggestion/ Grievance/ Complaint/ Application Portal ([www.lged.gov.bd/forms/form/feedback forms](http://www.lged.gov.bd/forms/form/feedback%20forms));



Figure-2: LGED's Own Website (www.lged.gov.bd) -Comment/Complaint menu is integrated

- (2) E-NOTHI Portal(www.mygov.bd);
- (3) Central GRS Portal(www.grs.gov.bd).

All these three interfaces/portals are linked to the website of LGED. The feedback page is LGED's own complaint portal. It is linked to E-NOTHI and central GRS. Using this facility, the complainant can file the complaint at the preferred portal from one place.

8.1.4 Other Means of Receiving Complaints

Generally, rural people do not feel comfortable to express their views or make any complaint personally (in person). They often become disinterested or hesitated to express their opinion or file a complaint following specific procedure or rule. Therefore, the program of collecting civil grievances or opinions through complaint boxes in local offices of LGED has been going on even before the introduction of online complaint portal system. People are submitting complaints appearing personally through local government or administration.

Nevertheless, complaints are received by e-mail, mobile phone, courier or post. Except LGED offices, people use to comment or complain about the quality of LGED's work or service through Zilla Parishads, Deputy Commissioners, Upazila Parishads and Upazila Nirbahi Officers. These offices use to forward complaints related to LGED immediately to the Head of the concerned LGED Office for onward action.

If any report about the work of LGED is published in any newspaper, Chief Grievance Redress Officer (GRO) register it in the complaint portal based on the merit. After registration onward actions are taken as per LGED GRS guidelines.

8.2 Plan/Policy/Guideline/Committee etc.

LGED has sufficient documents like policy, Guideline, plan, Committees etc. to mainstreaming Gender and handling gender discrimination including prevention of GBV and related realities. Some leading examples are:

8.2.1 Gender Equity Strategy of LGED

Gender Equity Strategy (GES) of LGED (*a Guideline for formulating sector wise Gender Action Plan*) has been developed based on the National Women Development Policy 2011. The Strategy has developed 4 (four) separate Gender Action Plans (GAP) covering the following sectors:

- (a) LGED core gender action plan (GAP);
- (b) Urban sector gender action plan (USGAP);
- (c) Rural Sector Gender Action Plan (RSGAP); and
- (d) Water Resource Sector Gender Action Plan (WRSGAP).

This Strategy (Guidelines) basically facilitated concerned sectors to understand the strategic issues, goal and objectives, preparation of procedures and implementation modality of the GAP. It has identified important strategic issues to be addressed in the respective sector wise Gender Action Plans (GAPs). The issues are as follows:

- (1) Policy adoption
- (2) Institutional arrangement
- (3) Data/information collection, monitoring and evaluation
- (4) Infrastructure development
- (5) Employment and working-environment
- (6) Training
- (7) Participation
- (8) Empowerment
- (9) Financing

8.2.2 Sexual Harassment Prevention Policy of LGED (2021)

LGED has meanwhile developed “Sexual Harassment Prevention Policy” to handle GBV instances at all stages. All the necessary provisions including “Sexual Harassment Prevention Committee” at different level. Succinct summary of provisions has been discussed in Sub-Section: 5.1 and 5.2. The policy is under process of approval by the Chief Engineer, LGED. As soon as it is approved, it will be implemented in addressing GBV.

8.2.3 Operating Guideline for Corporate Grievance Redress System (GRS)

8.2.3.1 General

To successfully operate the Grievance Redress System in LGED at all levels including Laborers/workers in construction sites/worksites. “Operating Guidelines for Corporate Grievance Redress System” has been formulated both in English and Bengali language. It has been approved by the Chief Engineer, LGED and distributed/circulated to all the stakeholders. The guideline is under practice right at this moment. It has covered even both

GOB and Development Partners Financed projects/programs/activities. There are provisions for addressing grievances related to Procurement, Environment, Social Safety and most importantly GBV both in workplace (office) and construction worksites.

8.2.3.2 Objectives of LGED GRS

The objective of LGED GRS is to:

- i.* Establish means, institutional arrangements and redressal mechanisms for beneficiaries, affected individuals, organizations and other stakeholders in all activities to file/ lodge /submit complaints/suggestions/comments/opinions on projects/construction contract and related services;
- ii.* Redress grievances of aggrieved persons (irrespective of genre) as well as receiving feedback, opinions, suggestions and comments from beneficiaries, victims and other concerned stakeholders including mass people;
- iii.* Analyze and collate messages, suggestions, comments, feedback, opinion etc. regarding grievances and communicate the decision of the authority concerned to the opinion and information providers.
- iv.* Be used as a tool to ensure citizens' participation in all activities and projects of LGED and to increase the accountability and transparency of LGED regarding its activities/services to them.

8.2.3.3 Scope of LGED GRS

There are two basic areas covered by the GRS system of LGED, namely, Civil works of all the 3 (Three) sectors (Rural, Urban and Small-Scale Water Resources) and Social Safety including Gender Based Violence (GBV). Civil Works includes Grievances and suggestions related to:

- *Land acquisition, Compensation and Rehabilitation/ Relocation of affected people;*
- *Project related procurement, fraud and corruption;*
- *Quality of construction work;*
- *Financial management;* On the other hand, Social Safety covers issues related to:
 - *Project worker management;*
 - *Discrimination against women;*
 - *Misconduct;*
 - *Health hazards;*
 - *Environment and personal safety;*
 - *Gender Based Violence (GBV);*
 - *Installation and usage of construction/labor camps etc.*

However, complaints pending/under investigation in court and related to Right to Information (RTI) cannot be submitted/filed/lodged using this GRS.

9. CONCLUSION

9.1 General

The incidences of Gender Based Violence are an integral and unavoidable reality of societies irrespective of locality. In the context of LGED both at workplaces (Offices) and the construction worksites the vulnerability exists undoubtedly although not with significant intensity. There is every potentiality of increasing such incidences in course of time depending on the changed perspectives like, male and structure female employees' ratio, category of activities, socio-economic and cultural structure of society etc.

9.2 The Procedure (Document)

LGED has been adapting contemporary development concept in implementing its all the activities since inception. It has its own strategy for mainstreaming gender in all sectors. Addressing GBV at workplaces and construction worksites LGED has formulated/formed good numbers of tools/committees/policies/guidelines etc. There is GRS system including own web portal integrated with the central GRS system of Government. The procedure for implementing these tools as per necessity and mode of applicability has been missing. The 1st version has been formulated. In course of advanced stages, there should be observations/ lessons to be incorporated and omitted in the updated versions.

9.3 Bangla Version of this Document

The lion share of the target group belongs to less educated or even uneducated genre especially, the laborers/workers at the construction sites. Therefore, easy understanding Bangla Version of this document shall positively play a vital role in achieving the expected (planned) outcome from this document towards redressing GBV in LGED holistically.

9.4 Improvement of Quality of the Implementation Procedure

In course of the GBV Grievance Redress System, individual citizens, groups/organizations shall have the opportunity to provide opinions with specific information on improving the quality of redressing GBV incidences in LGED both at Workplaces (Offices) and Worksites (Construction Worksites). Such suggestions forwarded to LGED shall be honored and incorporated in the system as per scope of applicability.

Annexure: All Forms related to Complaint and Appeal

FORM- A: Complaint Submission Form (LGED Workplaces)

The Grievance Redress Officer/Focal Person/Officer in-Charge

Name of Office:

Office Address:

Nature of GBV Complaint (Tick Applicable Box)

- Sexual Harassment Sexual Abuse Sexual Abuse and Harassment Sexual Violence
 Sexual Exploitation Financial Exploitation Others (Please Specify)

Information of Complainant (Victim):

01) Name of Complainant (Victim)*:

02) National Identity Card/Birth Registration/Passport Number*:

03) Permanent Address*:

04) Present Address* (Do) If similar with Present Address (If not Similar):

05) Mobile Number*: 06) e-mail (if any):

07) Date of Birth: 08) Sex: 09) Academic Qualification:

10) Workplace (Office)*: (e.g., Upazila Engineers Office)

07) Office ID (Address)*: (e.g., Upazila: Pangsá, District: Rajbari)

08) (Position/Rank) *:

Information of Accused (Missing Information Shall be Filled up by the GRO/Focal Point/Officer in-charge for Receiving/registering Complaints)

09) Name of Accused*:

10) National Identity Card/Birth Registration/Passport Number*:

11) Permanent Address*:

12) Present Address* (Do) If similar with Present Address (If not Similar):

13) Mobile Number*:

14) e-mail (if any):

19) Date of Birth: 20) Sex: 21) Academic Qualification:

22) Workplace (Office)*: (e.g., Upazila Engineers Office)

23) Office ID (Address)*: (e.g., Upazila: Pangsá, District: Rajbari)

24) (Position/Rank) *:

25) Description of Complaint with leading information* (Attach additional paper if necessary):

26) Prayer /suggestion of the Complainant (Victim) regarding actions to be taken in Redressing Grievance:

.....

27) Suggestion/Opinion for initiatives to be taken to prevent repetition of similar instance:

.....

To the best of my knowledge the information mentioned is completely true and correct

Date:

Complainant's Signature

- Attachment: 1. Description of complaint
2. Related documents
3. Copy of National Identity Card/Birth Registration Certificate

*Marked information should be filled mandatorily. **Complainant will be treated as anonymous if no personal information is provided. In this case final disposal of the grievance may not be possible.

The Appellate Officer

Name of the office of Appellate Officer:

..... Designation of Appellate Officer:

.....

Address of the office of Appellate Officer:

.....

Office/GRO/Focal Person/Officer-in Charge of Grievance and Disseminating Decision) Against Decision of whom/which Appeal is Being Submitted

Name of office against decision of which appeal is being submitted: (e.g., GRO, Upazila Engineer's Office)

Address of office against decision of which appeal is being submitted: (e.g., Upazila Engineers Office, Upazila: Pangsá, District: Rajbari)

Nature of Appeal (on GBV Grievance, Tick/mention)

- Sexual Harassment Sexual Abuse Sexual Harassment and Abuse Sexual Violence
 Sexual Exploitation Financial Exploitation Others (Mention as per Original Complaint)

Position/Category of Appellant (Tick any one box)

- Complainant/Victim Accused Officer/Staff GRO/Focal Person/Officer-in Charge of Redressal

Information of Appellant

01) Name of Appellant * :

02) Permanent Address* :

03) Present Address*(Do If Similar wit Present Address): (If not Similar):.....

.....

04) Mobile Number*:

05) e-mail:

06) Identity (Position) of Appellant: (e.g., Work Assistant, Complainant)

07) Office Identity (Where posted during complaint): (e.g., Upazila Engineers Office, Upazila: Pangsá, District: Rajbari)

Information of Accused

01) Name of Accused *:

02) Permanent Address*:

.....

03) Present Address*(Do If Similar with Present Address): (If not Similar):

.....

04) Mobile Number*:

05) e-mail:

06) Identity (Position) of Accused: (e.g., Work Assistant, Accused)

07) Office Identity (Where posted during complaint): (e.g., Upazila Engineers Office, Upazila: Sadar, District: Rajbari)

Information of Complaint/Grievance Redressal Processing

08) Subject of Grievance (Short Heading) *

09) Date of Submission of Complaint*:

10) Tracking Number of Complaint:

11) Date of Disposal of Complaint (In Applicable Cases) :

Appeal Related Information

12) Subject of Appeal *:

13) Description of Appeal (Attach Separate Sheet if necessary) *:

To the best of my knowledge the information mentioned is completely true and correct

Date:

Complainant's Signature

Attachment: 1. Description of Appeal; 2. Copy of Complaint; 3. Copy of the Appeal of Office/Offices Under Jurisdiction; 4. Related Documents. *Marked information should be filled mandatorily

FORM- C: Complaint Submission Form for Laborers/Workers

Grievance Redress Officer/Chairperson/ Member Secretary of LGRC/WGRC

Address of Worksite:

.....
.....

Package Number/ID:

Name of Contractor/Contracting Agency:.....

Full Contracting Address of Contractor:

.....
.....

Nature of GBV Grievance (Tick any one box)

- Sexual Abuse Sexual Harassment Sexual Abuse and Harassment Sexual Violence
 Sexual Exploitation Financial Exploitation Others (Please Specify)

Information of Complainant (Victim):

01) Name of Complainant (Victim)*:

02) National Identity Card/Birth Registration/Passport Number*:.....

03) Permanent Address*:

04) Present Address* (Do) If similar with Present Address (If not Similar):

.....

05) Mobile Number*: 06) e-mail (if any):

07) Date of Birth : 08) Sex:

09) Academic Qualification: 10) Occupation (Position at worksite):

Information of Accused (Missing Information Shall be Filled up by the GRO/Focal Point/Officer in-charge for Receiving/registering Complaints)

11) Name of Accused*:

12) National Identity Card/Birth Registration/Passport Number*:.....

13) Permanent Address*:

14) Present Address* (Do) If similar with Present Address (If not Similar):

.....

15) Mobile Number* : 16) e-mail (if any):

17) Date of Birth : 18) Sex:

19) Academic Qualification:

20) Occupation (Position at worksite):..... **Grievance Related Information**

21) Description of Complaint * (Attach additional paper if necessary):

22) Prayer /suggestion of the Complainant (Victim) regarding actions to be taken in Redressing Grievance:

.....
.....

23) Suggestion/Opinion for initiatives to be taken to prevent repetition of similar instance:

.....
.....

To the best of my knowledge the information mentioned is completely true and correct

Date:

Complainant's Signature

Attachment: 1. Description of complaint

3. Related documents

4. Copy of National Identity Card/Birth Registration Certificate

*Marked information should be filled mandatorily; Complainant will be treated as anonymous if no personal information is provided. In this case final disposal of the grievance may not be possible.

Form- D: Appeal Submission Form (Construction Worksites)

The Appellate Officer

Name of the office of Appellate Officer:

..... Designation of Appellate Officer:

..... Address of the office of Appellate Officer:

LGEC/WGRC/Officer-in Charge for Disseminating Decision Against GBV Grievance at Worksite Concerned for which Appeal is Being Submitted

Address of Worksite:

Package Number/ID:

Name of Contractor/Contracting Agency:

Full Contracting Address of Contractor:

Nature of Appeal (on GBV Grievance, Tick/mention)

- Sexual Harassment Sexual Abuse Sexual Harassment and Abuse Sexual Violence
 Sexual Exploitation Financial Exploitation Others (Mention as per Original Complaint)

Position/Category of Appellant (Tick any one box)

- Complainant/Victim Accused LGEC/WGRC/Officer-in Charge of Redressal

Information of Appellant

- 01) Name of Appellant (Victim)*:
- 02) National Identity Card/Birth Registration/Passport Number*:
- 03) Permanent Address*:
- 04) Present Address* (Do) If similar with Present Address (If not Similar):
- 05) Mobile Number*:
- 06) e-mail (if any):
- 07) Academic Qualification:
- 08) Occupation (Position at worksite): (e.g., Cook)

Information of Accused

- 09) Name of Accused *:
- 10) Permanent Address*:
- 11) Present Address*(Do If Similar with Present Address): (If not Similar):
- 01) Mobile Number*:
- 02) e-mail:
- 03) Academic Qualification:
- 04) Identity (Position) of Accused: (e.g., Mason)

Information of Complaint/Grievance Redressal Processing

- 05) Subject of Grievance (Short Heading)
*
- 06) Date of Submission of Complaint*:
- 07) Tracking Number of Complaint:
- 12) Date of Disposal of Complaint (In Applicable Cases) :

Appeal Related Information

- 13) Subject of Appeal *:
- 14) Description of Appeal (Attach Separate Sheet if necessary) *:

To the best of my knowledge the information mentioned is completely true and correct

Date:

Complainant's Signature

Attachment:

1. Description of Appeal;
2. Copy of Complaint;
3. Copy of the Appeal of Office/Offices Under Jurisdiction;
4. Related Documents. *Marked information should be filed mandatorily

**Local Government Engineering Department (LGED)
Code of Conduct (CoC)**

To

Prevent GBV and Sexual Harassment

(Name of the company/firm), has signed a contract with Local Government Engineering Department for (Name of the Project, Package/Contract no.). (Name of the Firm) is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. (Name of the firm) is also committed to creating and maintaining an environment where women and men will be protected from Gender Based Violence (GBV) as well as Sexual Exploitation and Abuse, and where Sexual Harassment (SH) have no place. Improper actions like Sexual Exploitation and Abuse (SEA) and sexual harassment are acts of Gender Based Violence (GBV) and as such will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the firm.

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

Core Principles

1. (Name of the firm) and therefore all employees, associates, representatives, sub-contractors and suppliers— commits to comply with all relevant national laws, rules and regulations related with GBV.
2. All forms of GBV including physical, emotional, sexual or economic violence are unacceptable, regardless of whether they take place on the worksite, the work site surroundings, at workers' camps or within the local community.
3. (name of the firm) will promote women workers' inclusion by ensuring women-friendly environment including safe-security and separate facilities for women in the workplace;
4. Acts of GBV constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment and, if appropriate, referral to the Police for further action.
5. Sexual harassment, sexual favors and any form of humiliating, degrading or exploitative behavior of work personnel and staff are prohibited.
6. All employees, including volunteers and sub- contractors are highly encouraged to report suspected or actual acts of GBV/SH.

Code of Conduct

1. Any of the worker, contractor or any other representative will not engage in Sexual Harassment, which means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature with other workers or personnel;
2. Not engage in Sexual Exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another;
3. Not engage in Sexual Abuse, which means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions;
4. Not engage in any form of sexual activity with individuals under the age of 18, except in case of pre-existing marriage;
5. Complete training/sensitization that may be provided related to the social aspects of Contract including training on Sexual Exploitation Abuse (SEA), and Sexual Harassment (SH);
6. Report any violations of this Code of Conduct; and
7. Not retaliate against any person who reports violations of this Code of Conduct.

I, the undersigned, acknowledge that I have read, recited, and understood the Code of Conduct of the SupRB. I agree to comply with the standards contained therein and I understand my role and responsibilities to prevent and respond to GBV and SH. I know that any action that contravenes this Code of Conduct may result in disciplinary action and may affect the continuity of my work within the SupRB Project

Signature

Representative of Program/
Project of LGED
Contact Number:

Representative of Contracting
Firm/Agency
Contact Number.....

According to the Bangladesh High Court's 2009 Guidelines, Sexual Harassment includes:

- a. Any action or comment known to be offensive, embarrassing, humiliating, demeaning or unwelcome to the recipient with sexual overtones either direct or indirect notions.
- b. Unwelcome sexually determined behavior (whether directly or by implication) as physical contact and advances;
- c. Attempts or efforts to establish physical relation having sexual implication by abuse of administrative, authoritative or professional powers;
- d. Sexually colored verbal representation;
- e. Demand or request for sexual favors;
- f. Showing pornography;
- g. Sexually colored remark or gesture;
- h. Indecent gesture, teasing through abusive language, stalking, joking having sexual implication;
- i. Insult through letters, telephone calls, cell phone calls, SMS, pottering, notice, cartoon, writing on bench, chair, table, notice boards, walls of office, factory, classroom, washroom having sexual implication;
- j. Taking still or video photographs for the purpose of blackmailing and character assassination;
- k. Preventing participation in sports, cultural, organizational and academic activities on the ground of sex and/or for the purpose of sexual harassment;
- l. Making love proposal and exerting pressure or posing threats in case of refusal to love proposal;
- m. Attempt to establish sexual relation by intimidation, deception or false assurance