

Good Practice Note

Addressing Gender Based Violence
in
Investment Project Financing involving Major Civil Works

28 September 2018

Acknowledgements

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Abbreviations

CEMAC	Central African Economic and Monetary Community
C-ESMP	Contractor’s Environmental and Social Management Plan
CMU	Country Management Unit
CoC	Code of Conduct
DEVAW	United Nations Declaration on the Elimination of Violence against Women
DV	Domestic Violence
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FSV	Family and Sexual Violence
FSW	Female Sex Worker
GBV	Gender-based Violence
GCT	GBV Complaints Team
GPN	Good Practice Note
GRM	Grievance Redress Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
IA	Implementing Agency
ICB	International Competitive Bidding
IPF	Investment Project Financing
IPV	Intimate Partner Violence
ISR	Implementation Status Report
IVA	Independent Verification Agent
M&E	Monitoring and Evaluation
NCB	National Competitive Bidding
NGO	Nongovernmental Organization
OHS	Occupational Health and Safety
PCN	Project Concept Note
PMU	Project Management Unit (also often referred to as a Project Implementation Unit, or PIU)
QER	Quality Enhancement Review
SBD	Standard Bidding Document
SEA	Sexual exploitation and abuse
SH	Sexual harassment
SEP	Stakeholder Engagement Plan
SIRT	Safeguards Incident Response Toolkit
SPD	Standard Procurement Document (also Standard Bidding Document, SBD)
STI	Sexually Transmitted Infection
TOR	Terms of Reference
TPM	Third-Party Monitor for GBV
UN	United Nations
UNICEF	United Nations International Children’s Fund
VAC	Violence Against Children
VAWG	Violence Against Women and Girls
WHO	World Health Organization

Key Terms and Definitions

<p>Violence against women and girls (VAWG)</p>	<p>The 1993 UN <i>Declaration on the Elimination of Violence against Women</i> defined violence against women and girls as any act of gender-based violence that results in, or is likely to result in, physical, sexual or mental harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life (Article 1).</p> <p>Violence against women and girls shall be understood to encompass, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation; • Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced sex work; • Physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs (Article 2). <p>Violence against women and girls is a manifestation of historically unequal power relations between men and women, which have led to domination over and discrimination against women by men and to the prevention of the full advancement of women.</p>
<p>Gender-based violence (GBV)</p>	<p>Gender-based violence (GBV) is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed (i.e. gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private (IASC 2015). Women and girls are disproportionately affected by GBV across the globe.</p>
<p>Sexual harassment (SH)</p>	<p>Unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report each. Both women and men can experience SH.</p>
<p>Sexual Exploitation and Abuse (SEA)</p>	<p>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 abuse is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Women, girls, boys and men can experience SEA. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEA.</p>
<p>Child/ Forced early Marriage</p>	<p>Forced marriage is the marriage of an individual against her or his will. Child marriage is a formal marriage or informal union before age 18. Even though some countries permit marriage before age 18, international human rights standards classify these as child marriages, reasoning that those under age 18 are unable to give informed consent. Therefore, child marriage is a form of forced marriage as children are not legally competent to agree to such unions (IASC 2015).</p>
<p>Human Trafficking</p>	<p>The recruitment, transportation, transfer, harboring or receipt of persons, by means of force, the threat of force, other forms of coercion, abduction, fraud, deception, of the abuse of power, or of a position of vulnerability, or giving or receiving of payments or benefits to achieve the consent of a person, having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the sex work of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs (United Nations 2000. Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children).</p>

Survivor Centred Approach	The survivor-centred approach is based on a set of principles and skills designed to guide professionals - regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centred approach aims to create a supportive environment in which the survivor’s rights are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor’s recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor’s capacity to make decisions about possible interventions.
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1. Introduction

1. The World Bank Group considers that no country, community, or economy can achieve its potential or meet the challenges of the 21st century without the full and equal participation of women and men, girls and boys. It is committed to closing gaps between males and females globally for lasting impact in tackling poverty and driving sustainable economic growth that benefits all (World Bank, 2018).¹
2. Thirty-five percent of women worldwide have experienced either non-partner sexual violence or physical and/or sexual intimate partner violence (IPV) (WHO 2013), both manifestations of Gender-Based Violence (GBV).² Major civil works³ can exacerbate the risk of GBV in both public and private spaces by a range of perpetrators in a number of ways, for example:
 - Projects with a large influx of workers may increase the demand for sex work—even increase the risk for trafficking of women for the purposes of sex work—or the risk of forced early marriage in a community where marriage to an employed man is seen as the best livelihood strategy for an adolescent girl. Furthermore, higher wages for workers in a community can lead to an increase in transactional sex. The risk of incidents of sex between laborers and minors, even when it is not transactional, can also increase.
 - Projects create changes in the communities in which they operate and can cause shifts in power dynamics between community members and within households. Male jealousy, a key driver of GBV, can be triggered by labor influx on a project when workers are believed to be interacting with community women. Hence, abusive behavior can occur not only between project-related staff and those living in and around the project site, but also within the homes of those affected by the project.
 - When land redistribution occurs—for example due to resettlement for civil works—women may be extremely vulnerable to GBV. This is particularly true in countries where the legal systems preclude women from holding land titles.
 - Women and girls’ job opportunities are limited due to a lack of appropriate transportation options. When creating job opportunities for women within projects, teams should be aware that traveling to and from work in some settings can force women and girls to use unsafe, poorly lit commuter routes, or unsafe public transport. Increased risk of violence is experienced when women are confronted with traveling long distances to access work opportunities or forced to travel at night.
3. This Good Practice Note (GPN) was prepared to assist Task Teams in establishing an approach to identifying risks of GBV, in particular Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), that can emerge in IPF with major civil works contracts and to advise Borrowers accordingly on how to best manage such risks. The GPN builds on World Bank experience and good international industry practices, including those of other development partners. While World Bank Task Teams are the primary audience, the GPN also aims to contribute to a growing knowledge base on the subject.
4. While this GPN is being issued in the context of the introduction of the World Bank’s new ‘Environmental and Social Framework’ (ESF), it is designed to support Task Teams working on new projects being prepared under the ESF, as well as projects that are currently under preparation or implementation that are subject to the safeguards framework that pre-dates the ESF.
5. The ESF’s Environmental and Social Standards (ESS) set out the requirements for Borrowers relating to the identification and assessment of environmental and social risks and impacts associated with projects supported

¹ <http://www.worldbank.org/en/topic/gender>

² GBV also affects men, boys and sexual minorities or those with gender-non-conforming identities. Disproportionately, however, GBV affects women and girls throughout their lifecycle, with profound, long-term impacts on health, agency, achievement and well-being

³ Major civil works include construction, maintenance and/or upgrading of infrastructure (transport, energy, water & sanitation, irrigation and urban infrastructure, school or hospital construction, etc.) and related supervision oversight, as well as technical assistance activities related to such projects.

by the World Bank. This GPN provides good practice for Task Teams on addressing GBV risks and impacts in the context of the ESF, including the following ESF standards, as well as the safeguards policies that pre-date the ESF:

- ESS 1: Assessment and Management of Environmental and Social Risks and Impacts;
 - ESS 2: Labor and Working Conditions;
 - ESS 4: Community Health and Safety; and
 - ESS 10: Stakeholder Engagement and Information Disclosure.
6. This GPN was informed by, and builds on the recommendations of the 2017 Independent Task Force Report⁴ of external experts, “*Working together to prevent sexual exploitation and abuse : recommendations for World Bank investment projects*” (hereinafter called the ‘2017 GBV Task Force Report’), 2017 GBV Task Force Report, which provided guidance on how the World Bank could strengthen its systems to prevent and mitigate GBV, in particular SEA and SH.
7. This GPN is guided by several key principles reflected in the 2017 GBV Task Force Report:
- *Be survivor-centered*: Approach considerations related to GBV prevention, mitigation and response through a survivor-centered lens⁵, protecting the confidentiality of survivors, recognizing them as principle decision-makers in their own care and treating them with agency, dignity and respect for their needs and wishes.
 - *Emphasize prevention*: Adopt risk-based approaches that aim to identify key risks of GBV and to undertake measures to prevent or minimize harm.
 - *Build on existing local knowledge*: Engage community partners—local leaders, civil society organizations, gender and child advocates— as resources for knowledge on local level risks, effective protective factors and mechanisms for support throughout the project cycle.
 - *Be evidenced-based*: Build on existing global research and knowledge on how to address GBV effectively.
 - *Be adaptable*: Operational guidance presented in this note provides the foundation for an effective GBV risk management approach; adapt and adjust mitigation measures to respond to the unique drivers and context in any given setting.
 - *Enable continuous monitoring and learning*: Ensure operations integrate mechanisms for regular monitoring and feedback to track effectiveness and to build internal knowledge of what works to prevent, mitigate and respond to GBV.

Scope of this GPN

8. This GPN sets out good practice for Task Teams on identifying, assessing and managing the risks of GBV in the context of Bank-financed IPF projects in any World Bank Global Practice that involve major civil works, defined here as civil works large enough to be carried out by a contractor, i.e., not small-scale projects such as community-driven development investments which often involve self-construction by beneficiary communities. The GPN does not focus on preventing GBV through specific infrastructure related interventions related to design (e.g. the lack of well-lit public transit spaces, construction of schools with toilets that are lockable and physically located in opposite areas for girls and boys). Some examples of how to prevent and respond to GBV through project design and implementation can be found in the online resource: [Violence Against Women and Girls Resource Guide](#).
9. Major civil works can be associated with an increase in GBV risks along four broad categories described in Figure 1. This GPN focuses on two of the four GBV risk categories that can arise in the context of IPFs that involve major civil works -- SEA and Workplace SH. (see **Figure 1**).

⁴ Gupta, Geeta Rao and Katherine Sierra (2017). Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects (English). Report of the Global Gender-based Violence Task Force. Washington, D.C. World Bank Group. <http://documents.worldbank.org/curated/en/482251502095751999/Working-together-to-prevent-sexual-exploitation-and-abuse-recommendations-for-World-Bank-investment-projects>.

⁵ See glossary of terms for the definition of a survivor-centered approach

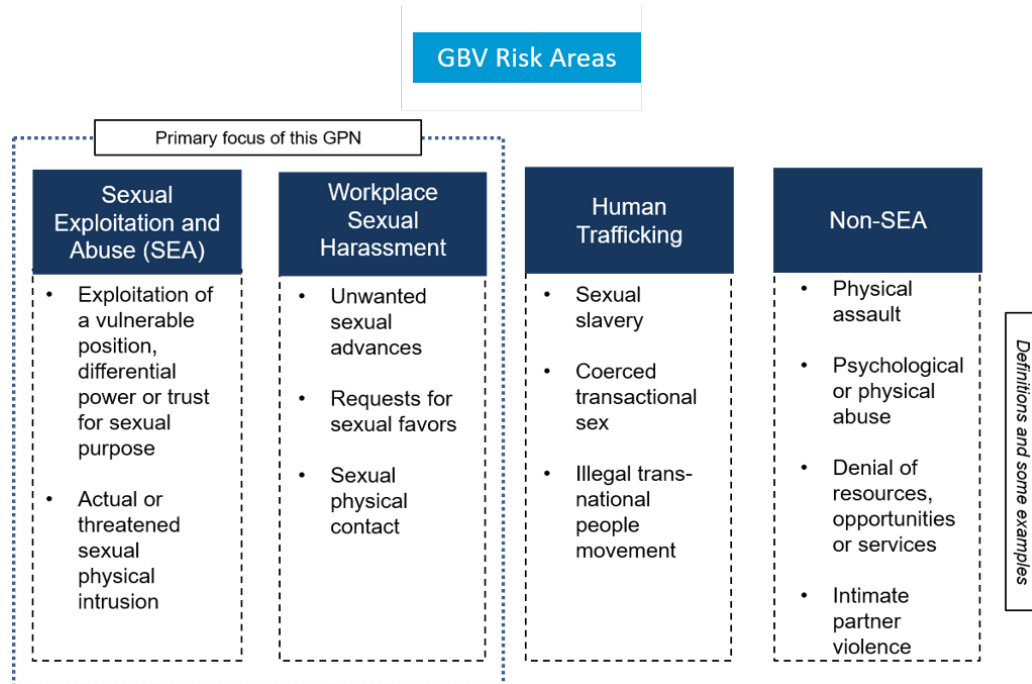


Figure 1: GBV Risk Areas

Structure of this GPN

- The GPN is structured around three key steps that cover actions to be undertaken during project preparation and implementation (see **Figure 2**).
 - Firstly, identify and **assess** the risks of GBV, including social and capacity assessments, and include measures for their mitigation in project design. Ideally, this is done during project preparation, with the understanding that GBV risk assessment is a continuous process and should take place throughout the project life cycle as GBV can occur at any moment.
 - Secondly, **address** the risks by identifying and implementing appropriate GBV risk mitigation and monitoring measures on an ongoing basis during project implementation.
 - Thirdly, **respond** to any identified GBV incidents, whether related to the project or not, ensuring that effective monitoring and evaluation (M&E) mechanisms, which meet the World Bank's internal safeguard and GBV reporting requirements, are in place to report on such incidents and to monitor follow up.
- This GPN is supplemented with Resource materials for Task Teams, including Terms of References (TOR), and examples of Codes of Conduct (CoC) and assessments including the [GBV Thematic Group Website](#).

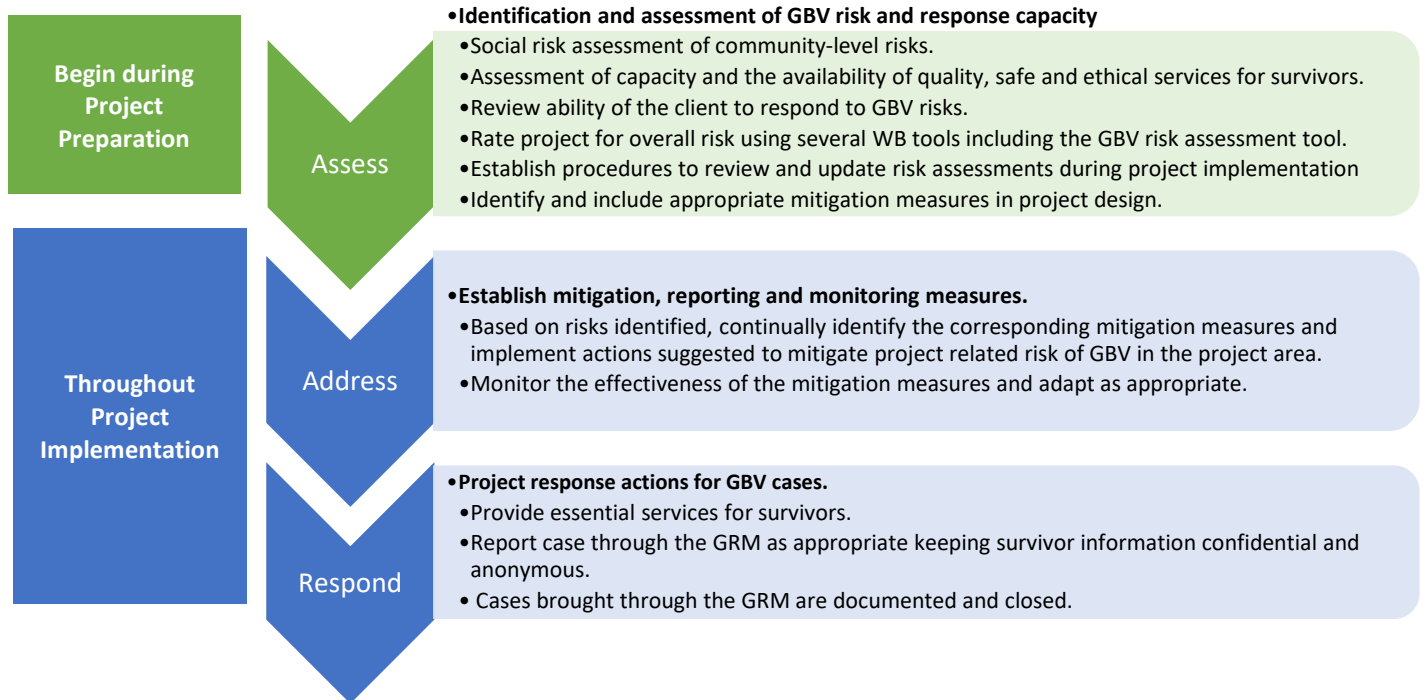


Figure 2. Assessing, Addressing and Responding to GBV Risks in IPF Involving Major Civil Works

2. GBV Considerations in Infrastructure Investment Project Financing Involving Major Civil Works

2.1 Definition of GBV

12. GBV is an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately affects women and girls across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps; during times of peace as well as in conflicts and crises.
13. The term GBV is most commonly used to underscore systemic inequality between males and females⁶—which exists in every society in the world—and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls (VAWG).⁷ The term GBV stems from the 1993 United Nations Declaration on the Elimination of Violence against Women, which defines violence against women as “any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women.” Discrimination on the basis of sex or gender identity is not only a cause of many forms of GBV, but also contributes to the widespread acceptance and invisibility of such violence—so that perpetrators are not held accountable and survivors are discouraged from speaking out and accessing support.
14. Manifestations of GBV include, but are not limited to:
 - Physical violence (such as slapping, kicking, hitting, or the use of weapons);
 - Emotional abuse (such as systematic humiliation, controlling behavior, degrading treatment, insults, and threats);
 - Sexual violence, which includes any form of non-consensual sexual contact, including rape;
 - Early/forced marriage, which is the marriage of an individual against her or his will often occurring before the age of 18, also referred to as child marriage;
 - Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person);
 - Trafficking and abduction for exploitation; and,
 - IPV perpetrated by a former or current partner, includes a range of acts of violence.
15. To understand if an act of violence is an act of GBV, one should consider whether the act reflects and/or reinforces unequal power relations between males and females.
16. Many—but not all—forms of GBV are criminal acts in national laws and policies. This differs from country to country, and the practical implementation of laws and policies can vary widely. Widespread impunity is a constant barrier—in developed and developing countries—and weak implementation of laws almost a universal characteristic in low- and middle-income settings.

2.2 GBV and Consent

17. **Consent** is a key consideration in GBV particularly with regards to SEA and SH. GBV arises when consent is not voluntarily and freely given. Consent must be informed, based upon a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give informed consent, the individual

⁶ Although usually referring to violence perpetrated by men against women, GBV also affects those in the ‘Lesbian, Gay, Bisexual, and Transgender’ (LGBT) population. The mitigation measures proposed here apply to all GBV-affected individuals.

⁷ The term GBV is often used interchangeably with Violence against Women and Girls (VAWG). See Arango, D., Morton, M. Gennari, F., Kiplesund, S, and Ellsberg, M. (2014). Interventions to Prevent and Reduce Violence Against Women and Girls: A Systematic Review of Reviews. Women's Voice, Agency, and Participation Research Series. Washington, DC: World Bank.

concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities.

18. Children are considered unable to provide informed consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. Article 1 of the United Nations 'Convention on the Rights of the Child'⁸ considers that children are those under the age of 18. The UN Secretary General's Secretary's bulletin on Special Measures for protection from sexual exploitation and abuse October 9, 2003 ST/SGB/2003/13 also defines children as anyone under the age of 18 and explicitly prohibits sexual activity with a child regardless of the age of majority or age of consent locally (para 3.2 b). This definition was also used in the 2017 GBV Task Force Report. **As a result, the World Bank considers children⁹ as anyone under the age of 18—even if national law may have a lower age—and, as such, not able to give free and voluntary consent.** As shown in Annex 1, this definition is reflected in the CoC requirements in the World Bank's Standard Procurement Documents (SPDs). Mistaken belief regarding the age of the child and consent from the child is not a defense for SEA of children. Sexual activity with individuals below the age of 18 is therefore considered child sexual abuse, except in cases of pre-existing marriage.¹⁰

2.3 GBV and Children

19. Child sexual abuse includes any form of sexual relations with a child, bearing in mind that a child cannot give consent. The United Nations International Children's Fund (UNICEF) estimates that 10 percent of girls worldwide under the age of 18 (approximately 120 million worldwide) have experienced rape or other unwanted sexual acts. Boys also report sexual abuse, although usually at lower levels than girls.
20. There is a high co-occurrence of VAW and Violence against children (VAC) and risk factors are shared amongst them: unequal gender norms and discrimination, lack of responsive institutions, weak legal sanctions and impunity for violence against children (VAC), cultural and legal acceptance of certain types of VAC, male dominance in the household, marital conflict with violence used for conflict resolution, and the harmful use of alcohol and drugs. Moreover, the link between witnessing violence in childhood and perpetrating or experiencing violence in adulthood is so strong that by preventing exposure to violence in childhood the likelihood of preventing violence in adulthood and future generations is high.
21. Treating children who have experienced violence, including sexual violence, necessitates specific measures that differs from the response to GBV on certain key issues and are outside the scope of this GPN.¹¹

2.4 GBV Perpetrators

22. For the purposes of this GPN, potential perpetrators of GBV can be any individuals associated with major civil works under a Bank-financed project including construction workers and other personnel of the contractor,

⁸ Article 34 of the Convention on the Rights of the Child states parties should undertake specific measures to protect the child from all forms of sexual exploitation and sexual abuse. Every member of the United Nations, except the United States, is a party to the Convention.

⁹ In this GPN the term 'child' is used interchangeably with the term 'minor' and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

¹⁰ The age of consent has important implications for workers employed on World Bank financed projects. If a worker is married to someone under the age of 18 and that marriage is recognized by a public, religious or customary authority and consistent with the legal age for marriage in the country, such under-age marriage shall not constitute a reason not to employ the worker. Under any circumstances other than these, Codes of Conduct shall prohibit workers from engaging in sexual intercourse with anyone under the age of 18. If a worker engages in sexual intercourse with anyone under the age of 18 while employed under the project, a range of employment sanctions shall apply, as set out in the Code of Conduct, following a full and fair review.

¹¹ External resources covering response to VAC include: (i) Responding to children and adolescents who have been sexually abused – WHO (ii) Caring for Child Survivors of Sexual Abuse – IRC and UNICEF; and (iii) INSPIRE: Seven strategies for Ending Violence Against Children

consultants supervising the civil works or undertaking technical assistance activities or studies relating to the civil works or the security personnel hired to protect a civil works site.

23. When consideration GBV risks associated with labor influx, it is also important to assess the changes in local power dynamics that may contribute to increase of GBV risks that may be perpetrated by local workers or partners of local women and girls. It is therefore important to consider broadly the range of potential perpetrators, combined with other contextual and project-related risks, to ensure projects integrate appropriate GBV risk mitigation strategies. For example, it is not enough to focus only on non-local workers that will be employed through the project as potential perpetrators. In activities to raise awareness of GBV and service provision, violence that occurs at the hands of a variety of perpetrators should be addressed.

2.5 GBV and Labor Influx

24. Projects involving major civil works often require a labor force and associated goods and services that cannot be fully met by local supply. Where this occurs, a labor force may be brought in from outside of the project area (either from other countries or other regions in a country) which may increase risks of GBV.
25. The [World Bank's] guidance to staff on identifying, assessing and managing the risks of adverse social and environmental impacts that are associated with the temporary influx of labor in the context of Bank-financed IPF projects is set out in the [2016 Labor Influx Guidance Note](#). The Guidance Note aims to help Task Teams screen projects to identify the risk profile for labor influx as the basis for helping the Borrower design the appropriate measures to mitigate the relevant risks and impacts. The two key considerations of the labor influx impact risk profile are: (i) the scale of the labor influx; and (ii) the "absorptive capacity" of the local community to accommodate this influx. For example, an influx of 100 workers in a major urban area would generally have a low impact, while the same number in a remote rural area, or one where Indigenous Peoples live, would normally have a high impact. Other factors (e.g. cultural, duration of works) may further refine the risk assessment. Labor influx risk is a key element to be considered when assessing GBV risk, in particular SEA and SH. Further information is given in the 2016 Labor Influx Guidance Note.

3 Assessing GBV Risks and Capacity to Respond

3.1 Introduction

- 26. When identifying risks, it is important to understand that there is no single driver of GBV. Experiencing GBV affects well-being, agency,¹² and self-actualization, including educational achievement, livelihood and employment prospects, physical and emotional health, involvement in civic activities, and many more.
- 27. GBV is experienced predominantly by women across all social and income groups. Research has identified multiple risk factors for GBV at the individual, relationship, community, institutional and policy levels. These include male-dominated household decision-making and income, policies and laws that discriminate against women, and cultural norms that justify or condone the use of violence against women and girls as a form of conflict resolution or discipline.
- 28. In the 2017 GBV Task Force Report, Table 1 (copied below as **Figure 3**) uses the ecological framework model¹³ to identify how IPF with major civil works can exacerbate the existing GBV risks or create new ones. Identifying and understanding project-related risk factors as they interact with other contextual risk factors is critical for development of appropriate prevention measures in project design. **Risks change over time, so it is essential they are continuously monitored throughout the life of a project.**

SOCIETAL	COMMUNITY	MALE PERPETRATOR	FAMILY	INDIVIDUAL
WORLD BANK PROJECT-RELATED				
<p><i>National, regional</i></p> <ul style="list-style-type: none"> • Higher levels of GBV than regional average • Low education levels of national labor force • Limited services; low capacity for service provision for survivors; in particular, limited or no judicial or police services to facilitate redress for survivors • Lack of specific legislation addressing incidence of GBV 	<p><i>Project size</i></p> <ul style="list-style-type: none"> • Geographic span of projects and communities that the project affects (e.g., larger projects intersect with more communities and are harder to monitor) • Duration—longer term projects increase risk <p><i>Project-affected population</i></p> <ul style="list-style-type: none"> • Small host community, unable to absorb large influx of workers • Rural host community lacking access to services and institutions, low capacity for absorption • Unequal participation of community members in community consultations 	<p><i>Project workers</i></p> <ul style="list-style-type: none"> • Not local • Lack of sanctions for inappropriate behavior from employer • Increase in income of workers distorts power balance between workers and communities • Increase in income enables transactional sex and exploitative relationships 	<p><i>Working with only men or women in a household</i></p>	<p><i>Lack of information on how to report project-induced grievances</i></p>

Figure 3: Risk Factors that Can Contribute to GBV in World Bank-Financed Projects with Major Civil Works

¹² At the individual level, *agency* means the capacity to make decisions about one’s own life and act on them to achieve a desired outcome, free of violence, retribution, or fear.

¹³ The ecological framework for understanding GBV is fully presented in the 2017 GBV Task Force Report, and in the Violence Against Women and Girls Resource Guide introduction.

29. All World Bank-financed IPF with major civil works currently under preparation and implementation should assess the risks that they may have related to GBV, and identify and implement mitigation measures to address those risks. There are two considerations:
- **GBV Risk Assessment:** assessment of the risk of exacerbation of GBV at the community level; and,
 - **Capacity Assessment:** assessment of the local capacity to prevent and respond to GBV, including the availability of safe and ethical service provision for survivors.
30. To assess the project-related risk of exacerbating GBV, there are two essential issues to consider. First, the country and/or regional context in which the projects takes place, and second, the potential risks that the project may bring. These GBV risks need to be assessed throughout the project’s life by monitoring the situation, assessing the effectiveness of risk mitigation measures, and adapting them accordingly (see **Figure 4**). When continuous monitoring efforts detect changes to the identified GBV risks and/or actual incidences of GBV, projects will need to adapt the GBV risk level and mitigation strategy. Additional guidance helpful for continuously monitoring GBV risk can be found under the [‘Integrate’](#) tab of the ‘Violence Against Women and Girls Resource Guide’ and in each accompanying sectoral brief.



Figure 4. GBV Risk Management Cycle Throughout Project Life

31. The key outcome of these risk assessments should be the classification of the project as at **Low, Medium, Substantial or High risk** of GBV. This rating will then feed into the overall Social Risk Rating of the project. The level of GBV-related risk in a project is assessed with the help of the GBV risk assessment tool. The assessed GBV risk level is factored into the project’s overall social risk, which, in turn, is factored into the overall environmental and social risk associated with a project. The project’s overall environmental and social risk is at least as high as the level of overall social risk, which, in turn, is at least as high as the level of GBV risk in a project. In other words, the overall social risk or the overall environmental and social risk in a given project cannot be lower than the level of GBV risk in the project. It is then recommended that the appropriate mitigation and monitoring measures (Chapter 4) are implemented based on this risk rating.

3.2 Risk Assessment

32. The assessment of GBV risk has to be undertaken both by the client and the World Bank Task Teams. For the client, the assessment of GBV risks on a project is normally undertaken as part of project preparation, particularly during community consultations. For the Task Team the assessment of risk should be done through the World Bank’s GBV Risk Assessment Tool. Both assessments are detailed below.
33. When considering GBV risks, there are different “areas of impact” that influence both the nature of the risk, and the appropriate mitigation measures that a project can implement:

- The **project site** is the location where the project’s activities are being undertaken. This includes both the actual locations where civil works are conducted, but also the associated areas such as the locations of workers’ camps, quarries, etc.
 - The project **adjoining communities** is generally the broader geographic area around of the project. This extends beyond the specific location where civil works are being carried out into the wider surroundings. Neighboring communities are at risk of GBV, particularly when workers are highly mobile.
 - There are also **regional and national** areas of impact that will not be affected by specific interventions on a project, but may benefit through institutional strengthening and other efforts to address GBV risks. An assessment at the regional and/or national level can give clients and Task Teams an understanding of those 34 experiencing GBV in that country and can give a sense of the type and scale of violence and its acceptability in the communities where World Bank-financed projects are implemented. For example, the less equality between men and women and the more violence against women and girls, the more likely it is that the project will inadvertently reinforce these situations if it does not proactively acknowledge and seek to mitigate this risk.
34. In most cases, the necessary information on the prevalence of GBV from the project to the national level is already available. Clients and Task Teams should rely on existing studies and research to guide their decision-making. Creating **baseline GBV surveys for the purpose of risk assessment should be avoided**. As discussed in Annex 2, extreme care needs to be taken when considering collecting information on GBV to assess risks.
35. Fragile or conflict-affected environments need to be carefully considered when assessing GBV risks for a project. In such environments communities may have undergone traumatic experiences and the social fabric may be broken down. Further, as a result of insecurity and conflict, the required support services and care are often limited. There may be a lack of security for communities and rampant impunity for crimes committed. Supervision of projects in such areas is difficult and, in some instances, requires reinforced security arrangements. Contractors may need to recruit police, peacekeepers or military personnel for security, however, these forces may not be subject to the national legal system but have their own internal judicial mechanisms that may either not have adequate enforcement, or not specifically prohibit GBV, especially SEA. The combination of these factors can significantly increase the risk for GBV and should be carefully considered in project preparation and implementation. Annex 3 provides a case study for how this has been done in the Central African Economic and Monetary Community (CEMAC) Transport and Transit Facilitation Project in Cameroon.

World Bank GBV Risk Assessment Tool

36. A tool for Task Teams to assess the risk of GBV, particularly SEA, has been developed by the World Bank and is available [here](#) for World Bank staff.¹⁴ The tool helps Task Teams understand the issues and risks of GBV in the project areas. It takes into consideration both project-specific details, such as labor influx levels, as well as the country context¹⁵ where the project takes place—such as situations of conflict. Through 25 questions, 12 to be answered by the project team and 13 that are prepopulated, the tool draws on information to give each project a risk ‘score’ based on the responses to the questions. The questions are meant only as a starting point, and are not intended to be exhaustive.
37. The risk score is calculated on a scale of 0 to 25: projects that score 0-12.25 are considered ‘**Low**’ risk; 12.5-16 ‘**Moderate**’ risk; and projects that score 16.25-18 represent a ‘**Substantial**’ risk, and project that score 18.25-25 are considered ‘**High**’ risk projects.
38. The GBV Risk Assessment Tool is designed to be applied at the outset of a new project. It is recommended that the GBV risk rating be included in the Project Concept Note (PCN) for consideration at the PCN review meeting. On the basis of additional information gathered during project preparation, the risk should be updated as appropriate for the Quality Enhancement Review (QER) meeting or at the Decision Review meeting.

¹⁴ <http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx>

¹⁵ Country context considerations are already populated automatically and require no additional input.

39. As with any tool, there may be situations where it is prudent to adopt a higher risk category than the tool suggests, if local conditions warrant. It should be emphasized that estimating GBV risk is not an exact science. The tool is meant to help launch the Task Team on a path to understanding how the proposed project may have GBV-related impacts. The tool will be monitored for its usefulness and accuracy for rating GBV risk. For more information on the tool, refer to Annex 4.

Client led GBV Risk Assessment

Stakeholder Engagement

40. As described in ESS10, stakeholder engagement is an inclusive process conducted throughout the project life cycle, and is important for managing the project's risks. Stakeholders¹⁶ in the project adjoining communities need to understand project risks and benefits. Projects are required to develop a Stakeholder Engagement Plan (SEP) to be implemented over the life of the project to keep the local communities and other stakeholders informed about the project, and to enable continuous engagement with and feedback from affected communities. For Substantial and High risk projects, the SEP is recommended to include GBV specific considerations for how to appropriately conduct consultations (see below).
41. Technology can facilitate continual communication and exchange with communities, particularly to track perceptions of GBV risk as linked to a project. It can also be an asset in assisting the community with access to services and updated information related to GBV, including access to services. Refer to Annex 8 for further information on technology and how it is currently being used in some World Bank operations to monitor GBV risks.
42. Stakeholder guidance should be sought to identify existing and potential local GBV risks, and they should be consulted on potential interventions and risk mitigation measures. Consultations with those working with adolescent girls and boys and other at-risk groups, and women leaders should be prioritized to enable understanding of GBV risks and trends in the community.
43. Task Teams should carefully monitor that effective and inclusive community consultations are undertaken. The consultations are generally organized by the IA¹⁷ with the support of the supervision consultant's safeguard specialists, although if the project's needs are very substantial, then an independent consultant to support the IA with consultations may be a more effective approach. **These consultations need to be continuous through the project life cycle, not just during preparation.**
44. To understand safe and ethical recommendations pertaining to GBV consultations, see the [Ethics](#) section of the Violence Against Women and Girls Resource Guide. Stakeholder consultations **should never directly ask about individual experiences of GBV**. Rather, they should focus on gaining an understanding of the experiences of women and girls in affected communities, including wellbeing, health and safety concerns. If any consultations are to take place with children, they must be carried out by a person trained in child consultations, with an understanding of local culture and customs. Before commencing with consultation, teams should be prepared with information related to those providing services to survivors in a community so anyone who discloses violence can be immediately referred. Taking into account these safety and ethical principles can prevent inadvertently causing harm when consulting with community members. Key considerations for the consultation process (see ESS10 for further details) are:
- Identify the project adjoining communities and plan stakeholder consultations on this basis.
 - Undertake consultations in accordance with the [Guidance Note on Stakeholder Consultations for Investment Projects](#). Community consultations should be conducted so that those affected by the project are properly informed, and to get their feedback on project design and safeguard issues.
 - Ensure consultation activities provide opportunities to share information with stakeholders on project-related risks and the proposed reporting and response measures. With a particular focus on women, children

¹⁶ The stakeholders of a project will vary depending on the details of the project. They may include local communities, national and local authorities, neighboring projects, and nongovernmental organizations.

¹⁷ Clients should consider hiring a GBV specialist to undertake consultations and key informant interviews related to GBV. This will ensure appropriate methodology and adherence to global ethical and safety standards.

and other at-risk groups—each of which may require different approaches to enable a safe space for discussion. Recognizing the gender power dynamics and social dynamics within a community and how they may inhibit participation, it is key to ensure that spaces are made available for women, men and children affected by the project to participate in consultations. It is important that the stakeholders be aware, at a minimum, of:

- The purpose, nature and scale of the project;
 - The duration of the proposed project activities;
 - Potential risks and impacts on local communities, and related to GBV:
 - The labor influx implications;
 - The ESHS and GBV, particularly SEA, risks that may be associated with the project;
 - The Employer’s (i.e. Government) ESHS Policy as required in the World Bank’s Standard Procurement Documents (SPDs);
 - The CoC standards to be used in the project (e.g. from the SPDs); and,
 - Who the local GBV Services Providers are, how to contact them, and the support services offered.
 - The proposed stakeholder engagement process and how stakeholders can provide feedback on the project; and,
 - The channels available to lodge complaints through the Grievance Redress Mechanism (GRM) and how they will be addressed.
45. It is also recommended that the IAs and the safeguards consultant consult with local organizations, women’s groups, nongovernmental organizations (NGOs) and relevant multilaterals to:
- Understand the types of GBV that are present in the community and that may be exacerbated by the project; including identification of what groups of individuals are most vulnerable to harm; where women and girls feel most unsafe; how the community currently deals with GBV incidences; and why GBV may be exacerbated by the project;
 - Map services and safe spaces available to survivors of GBV and spaces where GBV is currently reported;
 - Identify measures to mitigate project risks; and,
 - During GBV risk assessment activities there should be no attempt to contact survivors of GBV and question them about their GBV incident.¹⁸

Safeguard Documents

46. The **Environmental and Social Assessment (ESA)** identifies potential environmental and social impacts early on in project preparation and is usually the primary vehicle for assessing GBV risks on a major civil works project. The Borrower carries out an ESA of the project to assess the environmental and social risks of the project throughout the project life cycle. In areas of Substantial and High risk of GBV, as determined by GBV Risk Assessment Tool, the ESA should pay particular attention to identifying GBV risks. The consultants undertaking the ESA for such projects should ideally include a GBV specialist so that GBV challenges can be properly assessed and appropriate mitigation measures proposed.¹⁹

¹⁸ See: (i) The Violence Against Women and Girls Resource Guide Ethics page; (ii) Ellsberg, M., and L. Heise. 2005. *Researching Violence Against Women: A Practical Guide for Researchers and Activists*. Washington DC, United States: World Health Organization, PATH; and (iii) World Health Organization. 2001. *Putting women first: Ethical and safety recommendations for research on domestic violence against women*; and (iv) World Health Organization. 2007. *WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies*. Geneva, Switzerland.

¹⁹ A [list of vetted GBV specialists](#) can be found at the GBV thematic group webpage.

47. For ESAs to capture the socio-economic, cultural and risk context for women, they should consider:
 - Existing gender country diagnostics/country action plans;
 - Data on partner/non-partner physical violence against women²⁰;
 - Data and/or information on cultural practices vis-à-vis women (early marriage, physical practices);
 - Existing services available from GBV Services Providers;
 - Where health centers are located and what types of services are offered (e.g., whether they treat sexually transmitted diseases, provide reproductive health services, have supplies of rape kits including post-exposure prophylactics and emergency contraception, etc.);
 - Whether women have easy access to these services, and if they have mobility and/or economic constraints that may impede access; and,
 - Information obtained from consultations carried out in the preparation of the project.
48. A robust assessment methodology for social risk assessments and analysis can help identify critical markers to address project related risk. Tools such as key informant interviews, observation, free listing, pair-wise ranking, timelines and seasonal calendars, causal flow analysis and open-ended stories have all been used in the field of GBV research. For more information on how to apply these tools safely and ethically see Chapter 9 of the manual: *Researching Violence Against Women: A Practical Guide for Researchers and Activists*.²¹
49. It is vital that the ESA adequately identify GBV Risks. The project **Environmental and Social Management Plan (ESMP)** will however define the specific ways that GBV risks are to be addressed in the project by identifying mitigation measures including the development of a GBV Action Plan. It is usually included as part of the tender package and thereby forms part of the construction contract, with the contractor using the project ESMP to create the contractor's ESMP (C-ESMP).²² Annex 5 provides recommendations on the C-ESMP. Annex 5 describes the Project's ESMP and the C-ESMP in relation to GBV.
50. The project ESMP lays the first building block for addressing GBV, and particularly SEA and SH risks and should provide the appropriate umbrella framework for any proposed GBV mitigation measures, particularly those proposed in this GPN.
51. It is essential that project-level measures to address GBV risks consider other ongoing efforts to prevent and respond to GBV, and how the project will complement/use them. Project GBV interventions should be linked wherever possible with existing activities in the health sector, and other GBV Service Providers such as justice/security, psychosocial support and economic empowerment programming.

3.3 GBV Action Plan

52. For the project's GBV risks to be properly addressed, it is necessary to have an effective '**GBV Action Plan**', which outlines:
 - How the project will put in place the necessary protocols and mechanisms to address the GBV risks; and,
 - How to address any GBV incidents that may arise.
53. A GBV Action Plan is recommended for Moderate, Substantial and High risk projects but the activities outlined in the action plan will vary in accordance with risk: the higher the risk, the more will need be addressed through the

²⁰ These data are available in many Demographic and Health Surveys and are summarized as part of the Gender Sustainable Development Goals. These data exist for over 90 countries.

²¹ An adequate methodology to employ in risk assessments is: Ellsberg M, and Heise L. (2005). *Researching Violence Against Women: A Practical Guide for Researchers and Activists*. Washington DC, United States: World Health Organization, PATH.

²² Ideally, the ESMP's provisions should be included as part of the contract specifications, as this ensures that the requirements are put forward in a manner that contractors can understand and implement. However, since this is not always effectively done, including the ESMP as part of the bidding documents is the more common approach.

GBV Action Plan. It must be emphasized that the GBV Action Plan elements need to be customized for each project, local labor legislation and industrial agreements.

54. Ensuring that the project has an appropriate GBV Action Plan is the responsibility of the IA. The basis of the GBV Action Plan should be provided as part of the ESMP. The proposed approach on how to implement and monitor the GBV Action Plan including agreed sanctions for the Accountability and Response Framework and the CoC, should be provided by the contractor and consultants as part of the C-ESMP (See Annex 1 for a detailed example of a GBV Action Plan).
55. The GBV Action Plan needs to include specific **arrangements** for the project by which GBV risks will be addressed. This includes considerations such as:
 - Awareness Raising Strategy, which describes how workers and local communities will be sensitized to GBV risks, and the worker’s responsibilities under the CoC;
 - GBV Services Providers to which GBV survivors will be referred, and the services which will be available; and,
 - **GBV Allegation Procedures:** How the project will provide information to employees and the community on how to report cases of GBV CoC breaches to the GRM.
56. The **Accountability and Response Framework**, to be finalized with input from the contractor, should include at minimum:
 - GBV Allegation Procedures to report GBV issues to service providers, and internally for case accountability procedures which should clearly lay out confidentiality requirements for dealing with cases; and,
 - Response Framework which has:
 - Mechanisms to hold accountable alleged perpetrators associated to the project;
 - The GRM process for capturing disclosure of GBV; and,
 - A referral pathway to refer survivors to appropriate support services.
57. The ‘Response Framework’ outlines the disciplinary action for violation of the CoC by workers. **It is essential** that such actions be determined and carried out in a manner that is consistent with local labor legislation and applicable industrial agreements, otherwise there is risk that the CoC will not be implemented effectively. It is important to note that, for each case, disciplinary sanctions are intended to be part of a process that is entirely internal to the employer, is placed under the full control and responsibility of its managers and is conducted in accordance with the applicable national labor legislation and the individual worker’s employment contract. It is key that the proposed sanctions will be in line with local law as these may prohibit certain types of disciplinary measures, including termination of employee.
58. The supervision consultant should monitor and report on the effectiveness of the implementation of the GBV Action Plan to prevent and mitigate GBV risks associated with the project. Reporting should be done on a monthly basis (see more on Reporting in **Table 2: Proposed Reporting of GBV During Implementation**).

3.4 Assessing Capacity to Respond to GBV

59. The capacity to respond to GBV is dependent on the ability of the project to provide access to safe and ethical services for survivors. GBV Services Provider(s) and/or community-based organizations are critical not only for supporting the project in addressing any case of GBV that may arise, but also in assisting the project to proactively prevent GBV cases.
60. Section 5.2 and Annex 6 provide recommendations on how to identify and work with GBV Services Providers. Where appropriate to select a GBV Services Provider to provide services (Substantial and High risk projects) teams should verify that the provider can offer services in accordance with [international standards that articulate a minimum basic package of services](#), ideally including case management support, health services, psychosocial

support, police support and security, access to legal services, and shelter, if needed.²³ When identifying GBV Services Providers, the quality of service provision should be a key consideration.²⁴ To maximize access to all appropriate services applicable to a survivor of GBV, a service provider should be able to actively refer survivors to other service providers where needed to enable the survivor to get the range of services that will put the survivor on a path to recovery. In the majority of cases service providers offer one or two services, but not the whole range of services that may be applicable to a survivor's case. Documentation on how referrals should be made is often denoted as a referral pathway.

²³ For more information on services needed by GBV survivors see: <http://www.vawgresourceguide.org/overview>

²⁴ Quality standards for medical care can found at: <http://www.who.int/reproductivehealth/publications/post-violence-care-in-health-facilities/en/> Other service standards can be found at: https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE.Minimum.Standards.Publication.FINAL_.ENG_.pdf




4 Addressing GBV Risks

4.1 GBV Risk Mitigation and Response Measures

61. Once Task Teams have assessed and established the level of GBV risk as described in Chapter 3, they will need to consider a series of mitigation measures to address and monitor these risks throughout the life of the project. **Table 1** provides a summary of actions proposed to mitigate GBV risks, based on the GBV risk and the phase of preparation or implementation of the project. **The level of effort associated with the mitigation measures in Table 1 will usually vary by risk.** For example, the design of the GRM may vary according to the GBV risk.
62. The response measures recommended in this note apply to projects currently under preparation as well as those which begin preparation following the issuance of this GPN.
63. For projects which do not use loan/credit/grant proceeds to hire GBV service providers at the start of project implementation, it is recommended that Borrowers include an escalation clause in the Environmental & Social Commitment Plan (ESCP) should GBV risks become apparent over the course of project implementation. Borrowers might commit, for example, to hire (additional) GBV service providers using loan/credit/grant proceeds should the presence of GBV create a need for additional support.
64. Sample TORs, CoCs, GBV Action Plans and other materials to support implementing the recommendations are available at: <http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx>

Table 1: Recommended Actions to Address GBV Risks in IPF Projects ²⁵

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
Identification/Appraisal	Sensitize the IA as to the importance of addressing GBV on the project, and the mechanisms that will be implemented.	<ul style="list-style-type: none"> Preparation. Implementation. 	<ul style="list-style-type: none"> Task Team. 	<ul style="list-style-type: none"> Task team to monitor and provide additional guidance as necessary. 	✔	✔	✔	✔
	The project's social assessment to include assessment of the underlying GBV risks and social situation, using the GBV risk assessment tool to provide guidance and keeping to safety and ethical considerations related to GBV data collection. No prevalence data or baseline data should be collected as part of risk assessments.	<ul style="list-style-type: none"> Preparation. Implementation (before civil works commence). PCN and QER/Decision Review (GBV Risk Assessment Tool). 	<ul style="list-style-type: none"> IA for social assessment and ESMP. Contractor for C-ESMP. Task Team for GBV Risk Assessment Tool. 	<ul style="list-style-type: none"> Ongoing review during implementation support missions. Update project ESMP and Contractor's ESMP (C-ESMP) if risk situation changes. 	✔	✔	✔	✔
	Map out GBV prevention and response actors in project adjoining communities. ²⁶ This should incorporate an assessment of the capabilities of the service providers to provide quality survivor centered services including GBV case management, acting as a victim advocate, providing referral services to link to other services not provided by the organization itself.	<ul style="list-style-type: none"> Preparation Implementation 	<ul style="list-style-type: none"> IA 	<ul style="list-style-type: none"> Update mapping as appropriate 	✔	✔	✔	✔

²⁵ In the table  = Actions are recommended given the risk level;  = Actions that should be considered to be done, and adopted if appropriate, given the nature of the project and the associated risks;  = Actions are unlikely needed given risk level.

²⁶ A mapping exercise of GBV prevention and response actors should ideally be undertaken at a country level and shared with all project teams.

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	Have GBV risks adequately reflected in all safeguards instruments (i.e., Project ESMP, C-ESMP)—particularly as part of the assessment in the ESA. Include the GBV mapping in these instruments.	<ul style="list-style-type: none"> Preparation Implementation (before civil works commence). 	<ul style="list-style-type: none"> IA for social assessment and ESMP. Contractor for C-ESMP. 	<ul style="list-style-type: none"> Ongoing review during implementation support missions. Update project ESMP and Contractor’s ESMP (C-ESMP) if risk situation changes. 	✓	✓	✓	✓
	Develop a GBV Action plan including the Accountability and Response Framework as part of the ESMP. The contractor/consultant’s response to these requirements will be required to be reflected in their C-ESMP.	<ul style="list-style-type: none"> Preparation Implementation (before civil works commence) 	<ul style="list-style-type: none"> IA 	<ul style="list-style-type: none"> Ongoing review during implementation 	✗	✓	✓	✓
	Review the IA’s capacity to prevent and respond to GBV as part of Safeguard Preparation .	<ul style="list-style-type: none"> Preparation. Implementation. 	<ul style="list-style-type: none"> Task Team 	<ul style="list-style-type: none"> Ongoing review during implementation support missions. Update project ESMP if risk situation changes. 	✓	✓	✓	✓
	As part of the project’s stakeholder consultations, those affected by the project should be properly informed of GBV risks and project activities to get their feedback on project design and safeguard issues. Consultations need to engage with a variety of stakeholders (political, cultural or religious leaders, health teams, local councils, social workers, women’s organizations and groups working with children) and should occur at the start and continuously throughout the implementation of the project.	<ul style="list-style-type: none"> Consultations need to be continuous throughout the project cycle, not just during preparation. 	<ul style="list-style-type: none"> IA. 	<ul style="list-style-type: none"> Monitoring of implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when C-ESMP is updated. 	✓	✓	✓	✓

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	The Stakeholder Engagement Plan of the project, which will be implemented over the life of the project to keep the local communities and other stakeholders informed about the project's activities, to specifically address GBV related issues.	<ul style="list-style-type: none"> Consultations need to be continuous throughout the project cycle, not just during preparation. 	<ul style="list-style-type: none"> IA. 	<ul style="list-style-type: none"> Monitoring of implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when C-ESMP is updated. 	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Make certain the availability of an effective grievance redress mechanism (GRM) with multiple channels to initiate a complaint. It should have specific procedures for GBV including confidential reporting with safe and ethical documenting of GBV cases. Parallel GRM outside of the project GRM may be warranted for substantial to high risk situations.	Prior to contractor mobilizing.	IA, but discussed and agreed upon with the Task Team.	Ongoing monitoring and reporting on GRM to verify it is working as intended.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Ensure IA has a GBV specialist to support project implementation.	Preparation.	IA.	Ongoing reporting.	<input checked="" type="checkbox"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	For supervision have a social /environmental specialist in the supervision consultant's team with GBV specific skills to supervise issues related to GBV (e.g., supervise signing of Codes of Conduct (CoCs), verify working GRM for GBV is in place, refer cases where needed) and work with GBV Services Providers as entry points into service provision to raise awareness of the GRM.	During procurement evaluation process.	IA.	Ongoing reporting.	<input checked="" type="checkbox"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	Oversight through an independent Third Party Monitor (TPM) organization/Independent Verification Agent (IVA) (civil society organization, international or local NGO, academic partner, private sector firm) with experienced GBV staff for monitoring the implementation of the GBV Action Plan and ensuring all parties are meeting their responsibilities.	Preparation.	IA.	Ongoing reporting.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Funding must be available for IA to recruit GBV Services Providers to facilitate access to timely, safe and confidential services for survivors (including money for transportation, documentation fees, and lodging if needed).	Preparation	IA.	IA.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Projects which do not use loan/credit/grant proceeds to hire GBV service providers at the start of project implementation encourage Borrowers include an escalation clause in the Environmental & Social Commitment Plan (ESCP) should GBV risks become apparent over the course of the project implementation.	Preparation.	Task Team.	Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Procurement	Clearly define the GBV requirements and expectations in the bid documents .	Procurement.	IA.	Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Based on the project's needs, the Bank's Standard Procurement Documents (SPDs), and the IA's policies and goals, define the requirements to be included in the bidding documents for a CoC which addresses GBV .	Procurement.	IA.	Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	For National Competitive Bidding (NCB) procurement , consider integrating the ICB SPD requirements for addressing GBV risks.	Procurement.	IA.	IA with review by Task Team.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	The procurement documents should set out clearly how adequate GBV costs will be paid for in the contract. This could be, for example, by including: (i) line items in bill of quantities for clearly defined GBV activities (such as preparation of relevant plans) or (ii) specified provisional sums for activities that cannot be defined in advance (such as for implementation of relevant plan/s, engaging GBV service providers, if necessary)	Procurement.	IA.	Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Clearly explain and define the requirements of the bidders CoC to bidders before submission of the bids.	Procurement.	IA.	Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Evaluate the contractor's GBV response proposal in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV requirements	Procurement.	IA.	Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Implementation	Review C-ESMP to verify that appropriate mitigation actions are included.	• Implementation.	• IA.	• Review by IA. • Review by Task Team.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Review that the GRM receives and processes complaints to ensure that the protocols are being followed in a timely manner, referring complaints to an established mechanism to review and address GBV complaints.	• Implementation.	• Task Team. • IA	• Ongoing reporting. • Monitoring of complaints and their resolution.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	<p>Codes of Conduct signed and understood</p> <ul style="list-style-type: none"> • Ensure requirements in CoCs are clearly understood by those signing. • Have CoCs signed by all those with a physical presence at the project site. • Train project-related staff on the behavior obligations under the CoCs. • Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities. 	<ul style="list-style-type: none"> • Initiated prior to contractor mobilization and continued during implementation. 	Contractor, Consultant, IA.	<ul style="list-style-type: none"> • Review of GBV risks during project supervision (e.g., Mid-term Review) to assess any changes in risk. • Supervision consultant reporting that CoCs are signed and that workers have been trained and understand their obligations.²⁷ • Monitoring of GRM for GBV complaints. • Discussion at public consultations. 	✓	✓	✓	✓
	Have project workers and local community undergo training on SEA and SH.	<ul style="list-style-type: none"> • Implementation. 	<ul style="list-style-type: none"> • IA, Contractors, Consultants 	<ul style="list-style-type: none"> • Ongoing reporting. 	✓	✓	✓	✓
	Undertake regular M&E of progress on GBV activities, including reassessment of risks as appropriate.	<ul style="list-style-type: none"> • Implementation. 	<ul style="list-style-type: none"> • IA, Contractors, Consultants. 	<ul style="list-style-type: none"> • Monitoring of GRM. • Ongoing reporting. 	✓	✓	✓	✓

²⁷ Civil works supervision consultant's monthly reports should confirm all persons with physical presence at the project site have signed a CoC and been trained.

When	Action to Address GBV Risks	Timing for Action	Who is Responsible for Action	Ongoing Risk Management	Whether Action is Recommended or Advisable by GBV Risk Level			
					Low	Moderate	Substantial	High
	Implement appropriate project-level activities to reduce GBV risks prior to civil works commencing such as: <ul style="list-style-type: none"> • Have separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. • Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited. • As appropriate, public spaces around the project grounds should be well-lit. 	<ul style="list-style-type: none"> • Prior to works commencing. 	Contractor/ Supervision Consultant <ul style="list-style-type: none"> • Task Team. 	<ul style="list-style-type: none"> • Ongoing reporting. • Reviews during implementation support missions. 	○	☑	☑	☑

4.2 Addressing GBV risks through the Procurement Process

65. Embedding GBV requirements in procurement processes is a critical mechanism for ensuring legal accountability for addressing GBV in projects. Recent revisions to World Bank procurement requirements have strengthened measures to address GBV risks on World Bank-financed operations. SPDs and Standard Bidding Documents (SBDs), which the Borrower agrees to apply for international competitive procurement, provide the basis for ensuring that contractors and consultants fulfil the GBV obligations.

Bidding (Procurement) Documents

66. It is important that the bidding documents sufficiently reflect the findings of any ESA, and the requirements of the ESMP for addressing GBV and overall ESHS risks. The Bank's SPDs and SBDs (works-related and for supervision consultants) provide the framework and contain explanations and notes for including GBV-related provisions within the procurement documents, for example, through appropriate specifications in the Employer's requirements/TOR.
67. It is essential that the Task Teams ensure that the bidding documents clearly define the project's GBV-related requirements through the specifications and employer's requirements. Key considerations include:
 - The bidding document to be used are recommended to be reviewed to confirm that potential risks of GBV are adequately addressed given the nature of the project. This is particularly important when it is anticipated that:
 - The project will result in major labor influx; or,
 - National Competitive Bidding (NCB) will be used where the country's NCB documents do not adequately address GBV and ESHS risks.²⁸
 - High risk projects are recommended to include the requirement that bidders submit not only a CoC, but also a Labor Influx Management Plan for the proper management of the workers on the project.
 - Specifications (ideally) and/or the Particular Conditions to the Contract should be used to adequately address GBV risks and more broadly improve ESHS performance. Guidance on how to do this is contained in Procurement Guidance- Environmental, Social, Health and Safety in Procurement.
 - The project ESMP and other safeguard documents should fully describe the GBV risk (including a GBV Action Plan), and more broadly the ESHS expectations, and include appropriate mitigation measures. This should be transcribed into the specification in accordance with the guidance contained in the Procurement Guidance- Environmental, Social, Health and Safety in Procurement.
 - As described in further detail in the SPD (Works SPD PCC 4.1), the Bidding document should include a requirement that the Contractor shall not carry out any Works, including mobilization and/or pre-construction, unless the Engineer is satisfied that appropriate measures are in place to address environmental, social, health and safety risks and impacts. At a minimum, the Contractor shall be required to apply the Management Strategies and Implementation Plans and CoC, submitted as part of the Bid and agreed as part of the Contract. Guidance for how to do this for procurements that don't use SPDs is included in the Procurement Guidance- Environmental, Social, Health and Safety in Procurement.
68. Careful consideration needs to be given for how the costs for the contractor to implement the GBV requirements will be treated in the bid, evaluated, and paid as such. The project budget should be realistic about these costs. One option to consider is the use of a provisional sum which would see contractors paid for reasonable costs of

²⁸ As part of the decision to use National Procurement Procedures, an assessment of the national procurement documents should be undertaken to establish how and where provisions in respect to GBV should be included. The Bank's Task Team (including procurement, safeguards specialists) should work with the Borrower to identify the best mechanism for incorporating the necessary requirements. Should this process prove to be impractical for the project (e.g. requires lengthy clearances by multiple levels of authorities), an alternative interim approach would be to have the Borrower adopt a minimum CoC for all bidders to follow, which reflects the necessary ESHS and GBV requirements. Annex 1 describes how this was done in the Pacific Islands.

implementing the GBV Action Plan. The advantage of this approach is that all bidders will then have a consistent level of funding in their bids, neutralizing the implications of underpricing or overpricing.

During Bidding

69. It is essential to draw the attention of bidders to specific GBV requirements on the project. This can be done for example through market engagement (during the development of the Project Procurement Strategy for Development), use of clarifications, and/or during any pre-bid meetings. Details on how to do this are provided in the SPDs and the Procurement Guidance - Environmental, Social, Health and Safety in Procurement. It is recommended to be as clear as possible regarding the form and nature of the known GBV risks during this process, as well as the measures that bidders will need to take. The key information to provide bidders includes:
- The ESMP requirements, particularly with regard to ESHS expectations, and GBV requirements (including a response to the GBV action plan);
 - That civil works will not commence until the C-ESMP has been approved by the IA or the supervision consultant;²⁹ and,
 - That the C-ESMP—including the GBV Action Plan—may be disclosed on the IA’s web site,³⁰ and that the contractor should participate in public consultations at its own expense.

Bid Evaluation

70. The specifications or ESMP in bidding documents must include the requirements to respond to particular GBV risks or predicted impacts. As part of the contractor’s Social Management Plan, which should be submitted with the bid, they should include details on:
- Their proposed approach to implementing the GBV Action Plan including the Accountability and Response Framework (in response to the requirements outlined in the ESMP);
 - Their Codes of Conduct; and,
 - Other activities to address the GBV risks on the project (e.g. Labor Influx Management plan).
71. This information is to be assessed by the Borrower as part of the bid’s responsiveness. Where the deviations or omissions are not assessed to be material—which would lead to the bid being rejected—the Borrower may request the bidder to provide clarifications and/or additional information, for further evaluation.
72. In procurement processes that include rated criteria or a points system, GBV requirements may be part of the proposal scoring system. Where this is used, the Task Team should ensure that the requirements are specific and clear, and that the allocation of points relative to other factors is balanced.
73. Bidders are required to submit a declaration of whether they have had a contract terminated, suspended or a performance security called for reasons relating to past poor performance on ESHS issues. The declaration includes details of the reasons. If it is established that the cause is due to GBV, due diligence should be carried out by the IA to determine whether bidders have learned from past experience and how they have modified or implemented management controls to prevent recurrence. In the absence of the bidder demonstrating appropriate controls to

²⁹ For complicated or lengthy projects, it may be acceptable to have a “phased” C-ESMP. This means the C-ESMP would be approved in phases, reflecting the order in which civil works are done. For example, if a five-year project to construct an expressway only has asphalt paving in year four, then there is no need to have the asphalt plant’s environmental requirements included in the initial C-ESMP, which would instead focus on initial activities such as project mobilization and earthworks.

³⁰ This is not a World Bank requirement, but experience has shown that it is beneficial to the project engaging local communities as they are well informed of the specific project construction activities which may affect them. While ESMPs are disclosed through the World Bank’s external website, C-ESMPs should not be disclosed through the external website as they do not require a World Bank “no objection.” Their disclosure is recommended only to be on the IAs website.

prevent recurrence, the Task Team should review the IA's assessment and recommendation on next steps and consult with the IA as necessary as to how to ensure appropriate controls are in place.

4.3 Codes of Conduct

74. Since 2017, the World Bank's SPDs for civil works and supervision consultants procured under International Competitive Bidding (ICB) have required that workers sign a CoC as a first line mitigation measure (see Annex 1). A CoC clarifies an organization's mission, values and principles, linking them with standards of professional conduct.³¹ The CoC articulates the values the organization wishes to foster in leaders and employees and, in doing so, defines desired behavior. As a result, a written CoC can become a benchmark against which individual and organizational performance can be measured. **The SPD requirements for CoCs include provisions for addressing GBV, particularly SEA, and include prohibitions against sexual activity with anyone under the age of 18. Mistaken belief regarding the age of the child and consent is not a defense for engaging in sexual activity with minors.**
75. As noted earlier, the CoC is associated with a GBV Action Plan, which includes an 'Accountability and Response Framework' that outlines how complaints will be handled, in what timeframe, and the range of possible consequences for perpetrators of GBV so that the CoC can be implemented effectively (see Annex 1).
76. The World Bank has not endorsed a 'template' CoC for projects. The SPDs provide guidance on the minimum content of issues to be addressed in the CoC. Bidders are also required to describe the implementation arrangements for the CoC. As noted in Annex 1, some projects in low-capacity environments have worked with IAs to develop the IA's CoC, which is used as the minimum standard acceptable from bidders in their submissions. This IA CoC may be used by bidders should they not have one of their own. The [GBV Thematic group](#) has compiled sample CoCs from multiple organizations from around the world that may be used as reference documents when CoCs are being prepared by IAs or where CoCs of contractors are evaluated.
77. A key element of the CoC will be the sanctions that may be applied if an employee is confirmed as a GBV perpetrator. The sanctions need to be proportional to the transgression. Prior to imposition of sanctions, if a worker raises a credible challenge to alleged non-compliance with the CoC, the worker's employer should place the worker on administrative leave pending a full and fair review to determine the veracity of said allegation(s). An example of potential sanctions based on the Pacific Island transport projects include the following:
 - Informal warning;
 - Formal warning;
 - Additional training;
 - Loss of up to one week's salary;
 - Suspension of employment (either administrative leave as above or without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
 - Termination of employment; and/or,
 - Referral to the police or other authorities as warranted.

4.4 Contractor's ESMP

78. As noted in Section 3, the client's safeguard documents should identify the risk of GBV and propose mitigation measures—particularly through the project ESMP. The project **ESMP is usually the foundation for the C-ESMP**, which is the plan prepared by the contractor outlining specifically how it will implement the civil works activities in accordance with the project ESMP's requirements and with the contract.³² The C-ESMP, therefore, is a fundamental instrument for ensuring oversight and management of GBV risks.

³¹ <http://www.ethics.org/resources/free-toolkit/code-of-conduct>.

³² As part of the bid, the Contractor submits Management Strategies, Implementation Plans, and a CoC. The Contractor also submits, on a continuing basis, for the Engineer's prior approval, such supplementary Management Strategies and Implementation Plans as are

79. Annex 5 shows how an effective C-ESMP is essential for addressing GBV risks during implementation. Contractually, the contractor must follow the C-ESMP, which is why it is important that the C-ESMP build upon the findings and proposed measures identified in the project’s ESA and ESMP. For the few IPF with infrastructure investments that lack ESMPs and C-ESMPs, an alternative modality would need to be found.
80. Public disclosure and consultations on the C-ESMP—particularly with regard to GBV risk mitigation—is beneficial (but not mandatory) as it ensures that local communities are aware of the specific actions proposed to address the risks. Ideally, the works contract should require the contractor to participate in the consultations at its own expense, since they are related to the project works.

4.5 GBV Training for Contractors, Consultants and Clients

81. To properly address GBV, the training and sensitizing of workers is essential. These workers include civil works contractors (including sub-contractors and suppliers), supervision consultants, other consultants who may have a presence in the project adjoining communities—as well as the IAs. Projects can seek to embed training modules that incorporate GBV into the regular Occupational Health and Safety (OHS) ‘toolbox’ meetings with workers, official training and/or standalone training efforts. Linking the curriculum to actors outside the project such as health and education sector professionals may also be beneficial. Training on GBV should be thorough and proportional to the GBV risk. The modality, frequency and content of the training should be detailed in the GBV Action Plan.
82. At a minimum, training should include:
 - What GBV, particularly SEA and SH, is and how the project can exacerbate GBV risks;
 - Roles and responsibilities of actors involved in the project (the standards of conduct for project-related staff captured in CoCs);
 - GBV incident reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
 - Services available for survivors of GBV; and,
 - Follow-up activities to reinforce training content.
83. Training and awareness raising is a strong step toward behavior change. As projects are implemented, training on GBV should be made available to the project-affected communities so they can learn about the roles and responsibilities of actors involved in the project, processes for reporting incidents of project-related GBV, and the corresponding accountability structures. Training of both project-affected communities and project implementers allows all stakeholders to understand the risks of GBV, as well as appropriate mitigation and response measures, putting everyone on the same page.
84. Training IAs will also help to better understand the potential for GBV that can be exacerbated in the context of a project. An example of training conducted by the World Bank with clients in Uganda, as well as other recommendations on training and examples from several projects, can be found in Annex 9.

4.6 Grievance Redress Mechanisms

85. All World Bank financed IPF are required to have a GRM. To properly address GBV risks, the GRM needs to be in place prior to contractors mobilizing. While many projects have traditionally only considered GRM in the context of resettlement, as described in Annex 7, the World Bank’s ESF requires that IPF have a “grievance mechanism that will be proportionate to the risks and impacts of the project”. This is **meant to apply to all aspects of the project**.³³ Any parallel GRMs operated by contractors and consultants should include processes to refer complaints to the project GRM so as to ensure that an accurate understanding of the project’s complaints is always available.

necessary to manage the ESHS risks and impacts of ongoing works. These Management Strategies and Implementation Plans collectively comprise the C-ESMP.

³³ ESS 10 notes that the same GRM can be used land acquisition and resettlement (ESS5) and Indigenous Peoples (ESS7), but recommends a separate one for project workers under ESS2.

86. For GBV—and particularly SEA and SH—complaints, there are risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. The GRM therefore needs to have multiple channels through which complaints can be registered in a safe and confidential manner (see Annex 7). Specific GRM considerations for addressing GBV are:
- The GRM is usually operated by the IA, or the PMU on the IA’s behalf. When there are Substantial or High GBV risk projects, consideration should be given to a separate GBV GRM system, potentially run by a GBV Services Provider—with feedback to the project GRM similar to that for parallel GRMs by contractors and consultants. Annex 7 provides additional discussion on the pros and cons of addressing GBV through the overall project GRM system as opposed to an independent parallel GBV GRM. The GRM operators are to be trained on how to collect GBV cases confidentially and empathetically (with no judgement). See Annex 2 for further details.
 - Projects must have multiple complaint channels, and these must be trusted by those who need to use them. Community consultations may be one mechanism to identify effective channels (e.g. local community organizations, health providers, etc.).
 - No identifiable information on the survivor should be stored in the GRM.
 - The GRM should **not** ask for, or record, information on more than three aspects related to the GBV incident:
 - The nature of the complaint (what the complainant says in her/his own words without direct questioning);
 - If, to the best of their knowledge, the perpetrator was associated with the project; and,
 - If possible, the age and sex of the survivor.
 - The GRM should assist GBV survivors by referring them to GBV Services Provider(s) for support immediately after receiving a complaint directly from a survivor. This will be possible because a list of service providers will already be available before project work commences as part of the mapping exercise.
 - The information in the GRM must be confidential—especially when related to the identity of the complainant. For GBV, the GRM should primarily serve to: (i) **refer** complainants to the GBV Services Provider; and (ii) **record** resolution of the complaint (see Chapter 5).
87. **Data Sharing:** The GBV Services Provider will have its own case management process which will be used to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GRM operator. The GBV Services Provider should enter into an information sharing protocol with the GRM Operator to close the case. This information should not go beyond the resolution of the incident, the date the incident was resolved, and that the case is closed as described in Chapter 5. Service providers are under no obligation to provide case data to anyone without the survivor’s consent. If the survivor consents to case data being shared the service provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or service provider at risk for experiencing more violence. For more information on GBV data sharing see: <http://www.gbvims.com/gbvims-tools/isp/>.
88. The costs of operating the GRM are usually modest and should be financed by the project as part of the general project management costs.³⁴
89. The GRM should have in place processes to immediately notify both the IA and the World Bank of any GBV complaints with the consent of the survivor. For World Bank reporting protocol refer to the Safeguards Incident Response Toolkit.

³⁴ The operation of the GRM does not include the cost of resolving GBV complaints (e.g. survivor support services), which, depending on the risk level and the mechanism in place, may be more costly.

4.7 Monitoring and Reporting

90. It is essential that the project monitor GBV activities. M&E plays a key role in assessing the effectiveness of mitigation measures. As part of the M&E process, indicators need be selected for inclusion in the project Results Framework.

Results Framework Indicators

91. The project's Results Framework should include indicators related to: (i) the GBV activities on the project; and, (ii) the GRM.
92. GBV indicators may include:
- Successful implementation of agreed GBV Action Plan (Y/N);
 - Number of training courses related to GBV delivered;
 - Percentage of workers that have signed a CoC; and/or,
 - Percentage of workers that have attended the CoC training.
93. **GRM indicators:** To measure the effectiveness of the GRM, the publication of statistics on complaint resolution in accordance with IDA recommendations on [Citizen Engagement](#) should be followed. In addition, the following indicator could be considered to measure the effectiveness of the GRM addressing GBV-related complaints "Number of GBV grievances that have been referred to GBV Services Providers."³⁵ An additional indicator which is useful to monitor is the time it took to resolve the GBV-related complaint. Reporting During Implementation
94. Projects have a significant role to play in supporting safe spaces for women and children to report their experiences of violence. It should be noted that increases in the number of reported cases does not necessarily mean that GBV incidents have increased but likely reflects improved mechanisms for safe and confidential reporting and increased interest in accessing GBV support services. **Table 2** proposes the reporting mechanisms for GBV monitoring. It should be emphasized that any reporting should have no identifiable information on individual cases. It is essential that the confidentiality and safety of GBV survivors is protected.

³⁵ This is not one of the recommended "Citizen Engagement" indicators as per the Guidance Note on Results Framework and Monitoring & Evaluation, but is an important GRM indicator with regard to monitoring GBV in the project and identifying any changes to the project's GBV risk profile.

Table 2: Proposed Reporting of GBV During Implementation

Who	To Whom	What	When	Objective
GRM Operator	IA (and IA to furnish to WB)	<ul style="list-style-type: none"> Reporting of GBV incidents with three key data: <ul style="list-style-type: none"> Nature of the case; Project related (Y/N); and, Age and/or Sex (if available). 	As soon as becomes known	<p>For IA to monitor response.</p> <p>For WB to report to management in accordance with SIRT .</p>
GBV Services Provider (Contracted to project)	IA and Supervision consultant	<p>Aggregate data on case load:</p> <ul style="list-style-type: none"> Number of GBV cases referred by the GRM, disaggregated by adult/children and by sex; The number of cases open, and the average time they have been open; and, The number of cases closed, and the average time they were open. 	Monthly	To ensure accountability of GBV service provider particularly if financial support is being provided for survivor support.
Supervision Consultant	IA	<ul style="list-style-type: none"> Status on the implementation of project's GBV Action Plan; The agreed project GBV indicators e.g.: <ul style="list-style-type: none"> Successful implementation of agreed GBV Action Plan (Y/N); Number of training courses related to GBV delivered; Percentage of workers that have signed a CoC; and/or Percentage of workers that have attended the CoC training. That the GRM is functioning correctly for receiving and resolving complaints The GRM indicators; and, That an appropriate mechanism to resolve GBV complaints is established and functional. 	Monthly	Part of overall supervision engineer's duty to monitor day-to-day activities and implementation of project's CoC.
Implementing Agency	WB	<ul style="list-style-type: none"> Project GBV indicators; and, GRM indicators (as supplied by the Supervision Consultant) 	In accordance with project legal agreements	In accordance with the standard Practice Results Framework Reporting.
TPM Organization (if applicable)	IA (and IA to furnish to WB)	<ul style="list-style-type: none"> The implementation of the GBV Action Plan; The functioning of an appropriate mechanism to address and resolve GBV complaints; The functioning of the GBV Services Provider; and, The functioning of GRM and the status of GRM indicators related to GBV. 	Quarterly	Part of overall TPM Organization's duty to monitor implementation of CoC.

95. **Aide Memoires:** Aide Memoires should include the data provided by the IA through the supervision consultant as well as any information from the TPM/IVA.
96. **Implementation Status Reports (ISRs):** The ISRs should include updates on the status of the GBV activities on the project, as well as to the indicators in the Results Framework.

4.8 Stakeholder Engagement

97. As noted in Chapter 3, consultations with local communities in the project’s adjoining communities **need to be continuous throughout the project life**. These regular consultations should provide opportunities to share information with communities on project-related risks and reporting and response measures, and to identify any issues that may be arising with regard to GBV. This means the consultations should have a particular focus on women, children and other at-risk groups—each of which may require different approaches to enable a safe space for discussion.

4.9 Supervision and Oversight

98. Contractors on civil works projects are typically supervised by a consulting firm on behalf of the IA. A key challenge faced by many projects is that the supervision and oversight of GBV activities during civil works is inadequate. This section outlines activities that can be incorporated into the project to make supervision and oversight more proactive.

Supervision Modalities

99. Effective supervision and oversight of the project’s GBV prevention and mitigation efforts is vital, and should therefore be carefully considered during project preparation. As shown in **Figure 5**, effective oversight requires various actors with additional ones needed in higher risk projects. All entities involved—supervision consultants, the IA, any independent oversight entities, as well as other entities such as steering committees and civil society—must have clear roles and responsibilities throughout the implementation of the project. All those involved in GBV activities should have appropriate training and skills for the tasks assigned to them.

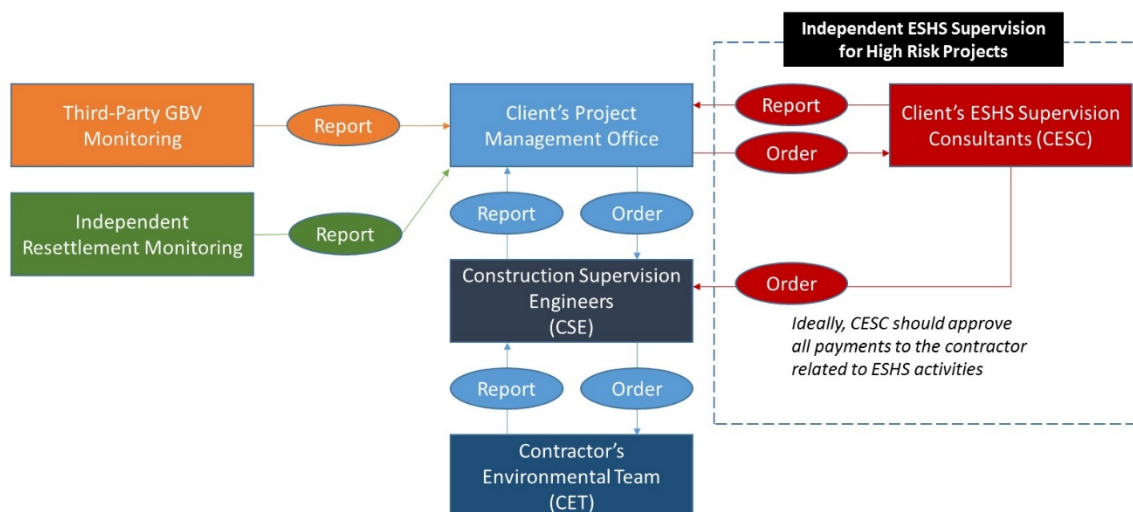


Figure 5. Supervision and Oversight Options for High Risk Projects Based on China Hubei Yiba Highway Project

Supervision Consultants

100. The TOR for the supervision consultants need to clearly outline the expectations of their role in ensuring that GBV risks and mitigation measures are properly reflected in the C-ESMP and are implemented. It is critical that the supervision consultant has appropriately qualified social and environmental specialists. In addition, for Moderate, Substantial and High risk projects, the consultants need to demonstrate that they have the appropriate capacity to take on GBV related responsibilities, such as supervising the signing of CoC, verifying that a working GRM for GBV is in place so that referral of GBV cases can be made when needed, and work with GBV Services Providers and

entry points into service provision (as required) to raise awareness of the GRM. They also have a role in the resolution of GBV complaints made to the GRM, not only for the project but also for ensuring any sanctions on their own staff are applied.

101. For projects with Substantial and High risk of GBV, it is prudent to require quarterly inspections to monitor the implementation of GBV mitigation measures. The inspections are recommended to include: (i) the supervision consultant's resident engineer, who is the one tasked with day-to-day oversight of the contractor; (ii) the supervision consultant's GBV specialist; and, (iii) the IAs GBV specialist. The presence of the IA's GBV specialists—who may be the project's social specialists—will assist the resident engineer in meeting the necessary GBV standards, and all the specialists to verify that project safeguard reports adequately reflect the actual situation with regard to mitigating GBV risks.

Implementing Agency Staffing

102. It is recommended that the IA have appropriate environmental and social specialists available. Without them, it will be very difficult to manage the project's ESHS risks—especially related to GBV. For projects at Substantial or High risk of GBV, it is recommended for the IA to have a GBV specialist as part of the safeguard team to ensure GBV-related activities and services are being delivered according to global quality and ethical guidelines.

Independent Monitoring of GBV

103. If there is a high risk of GBV in a project, **independent third-party GBV monitoring (TPM) is recommended**. The TPM or IVA is an organization commissioned to independently monitor and report on the effectiveness of GBV Action Plan implementation to prevent and mitigate GBV risks associated with the project³⁶. The role of the TPM/IVA **is not to track, investigate or follow up on individual cases of GBV**—that is the role of the GBV Services Provider, which also ensures confidentiality for the survivor. The TPM/IVA has a higher-level oversight function to confirm that all project actors, including the GBV Services Provider and the designated focal points or committee to address and resolve GBV complaints, are implementing the GBV Action Plan. The TPM/IVA verifies that the provisions to prevent and respond to GBV are in place and functioning, and also can provide early warning of problems that may surface.
104. The selection of the TPM/IVA should be based on the project context, scope and reality on the ground and may be a civil society organization, international or local NGO, academic partner, private sector firm or dispute board mechanism. The TPM/IVA will be required to have experience in GBV so that part of the monitoring can be used to evaluate the quality of the actions undertaken. They should provide regular reports (minimum quarterly) directly to the IA, who should remit them to the Task Team.

³⁶ TPM typically involves verification of outputs by an entity paid from a source of funding that is external to the project or program's direct beneficiary chain or management structure, whereas IVA play a similar verification role but can be contracted using project funding. Many refer to IVA as TPM, including the 2017 GBV Task Force Report.

5. Responding to GBV Incidents

5.1 A Survivor-Centered Approach

105. Global best practice recognizes that it is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs and wishes are prioritized in every decision related to the incident. The survivor of GBV, particularly SEA and SH, who has the courage to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.
106. **Confidentiality** is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
107. If the alleged perpetrator is an employee of the contractor, consultant or IA, to protect the safety of the survivor, and the workplace in general, the IA, contractor or consultant, in consultation with the survivor—and with the support of the GBV Services Provider—should assess the risk of ongoing abuse to the survivor and in the workplace. Reasonable adjustments should be made to the alleged perpetrator's or survivor's work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary. The employer should provide adequate leave to survivors seeking services after experiencing violence.

5.2 GBV Services Providers

108. As noted in Chapter 3 and Annex 6, one of the most effective ways of addressing GBV risks and incidences lies in working with GBV Services Provider(s) and community-based organizations that are able to support the project in addressing any case of GBV that may be project related, while also working to proactively prevent such cases.
109. **Identifying GBV Service Providers:** All projects are recommended to identify GBV Services Provider(s)—prior to project Appraisal—irrespective of the risk level. This is because GBV incidents may arise on any project and it is necessary to have the appropriate response mechanisms in place. Mapping of GBV prevention and response actors in a given community may already exist, particularly in humanitarian settings. Where no or insufficient local knowledge on prevention and response service providers is available, ideally the Country Management Unit (CMU) should undertake a mapping exercise through a portfolio approach that identifies qualified GBV Services Providers, NGOs and community-based organizations in the project's adjoining communities. In the absence of this, Task Teams can also undertake the exercise. In all cases mapping of GBV service providers should be verified during project preparation as funding for GBV services provision is scarce and can shift the service provision landscape in a matter of months. If no such organization exists in the project area, service providers from other areas (national or international) that meet international standards are recommended. Alternatively, if this is not possible, the Task Team, in consultation with the necessary GBV and/or health specialists, should evaluate whether there is a possibility in the project to finance a capacity development program to provide appropriate GBV support. This has to be carefully planned and considered.³⁷
110. **Financing GBV Services Providers:** In High or Substantial risk projects in remote areas, where existing arrangements are not already in place to cover the costs of GBV Service Providers, it may be prudent to have the IA contract with one or more GBV Services Provider to provide specific services (typically using loan/credit/grant proceeds). This will make it easier to ensure that any survivors receive the necessary support. **No monetary compensation should be given directly to the survivor; all support services and accompanying transportation, housing and support requirements (money for official documentation or collection of forensic evidence) are paid through the service provider.**
111. If financed through the project, the GBV Services Provider should document the level of support given to a survivor, including referral to other service providers. Beyond unidentifiable aggregate key data points (e.g. nature of case, related to project and if available age and gender) case data should never be requested of service providers. In the exceptional situation where Service Providers need to share any more detailed with an outside party this must

³⁷ An example of this is the Tuvalu Aviation Investment Project, where an activity was included under the third Additional Finance to establish support services for survivors of GBV as such services were unavailable in Tuvalu. This saw the Fiji Women's Crisis Centre undertake training and capacity building activities financed by the project.

be with the permission of the survivor. The survivor must give consent to data sharing and know what data will be shared, with whom and for what purposes. For more information on GBV information sharing see: <http://www.gbvims.com/gbvims-tools/isp/>.

112. It is important that the GBV Services Provider understands their legal obligations, the legal limits of confidentiality, as well as their professional codes of practice, particularly when it comes to reporting GBV cases to the police. The WHO does not recommend mandatory reporting of GBV to the police³⁸ but if a country's legislation requires mandatory reporting, the GBV Services Provider should inform the IA and the potential survivor of this obligation, as well as of any other limits of confidentiality.

5.3 Handling GBV Complaints

113. All projects need to have a framework for properly handling GBV allegations. There are at least three key actors involved in handling GBV allegations: (i) the GRM operator; (ii) the GBV Services Provider and, (iii) the representative of the IA. It is therefore essential that prior to GBV complaints being received, all projects clearly identify who specifically will be responsible for handling the complaint: who will assess the nature of the complaint, the appropriate sanction to be applied to the perpetrator, verifying that the survivor has received support, and the sanctions have been enacted, etc. Teams should note that existing modalities for reporting complaints may not be appropriate to enable reporting or to handle the sensitivities associated with GBV. Teams may therefore need to identify alternate channels for reporting, such as the GBV Services Provider.
114. The IA should establish an accountability and response mechanism for resolving GBV cases. Whilst the process for the resolution and the people involved may vary, the key guiding principle for the resolution process should be to ensure the complete confidentiality of the survivor, a survivor centered approach, a speedy resolution and that the process outlined in the agreed upon 'Accountability and Response Framework' is applied. Any person involved in the resolution process should be specifically trained to address and resolve GBV related complaints and where ever possible a dedicated focal point from the GBV Services Provider should be part of the resolution process. An example of a resolution mechanism applied in the Vanuatu Aviation Investment Project (VAIP) can be found in Annex 7.
115. The process for addressing complaints would typically be along the following lines (see Annex 7):
- The GRM operator will keep GBV allegation reports confidential and, unless the complaint was received through the GBV Services Provider or other identified reporting channels, refer the survivor immediately to the GBV Services Provider.³⁹
 - If a case is first received by the GBV Services Provider or through other identified reporting channels, the report will be sent to the GBV operator to ensure it is recorded in the system.
 - The GBV Services Provider provides the necessary support to the survivor until it is no longer needed (see Section 5.4).
 - If requested by the IA, a survivor's representative from the GBV Service Provider will participate in the GBV resolution mechanism, including referral to the police if necessary. The survivor must give the service provider representative consent to participate in the GBV resolution mechanism on her/his behalf.
 - As part of the established resolution mechanism GBV allegations are considered and agreement is reached on a plan for resolution as well as the appropriate remedy for the perpetrator, all within the shortest timeframe possible to avoid further trauma to the survivor.

³⁸ For further information see the WHO Responding to intimate partner violence and sexual violence against women WHO clinical and policy guidelines (2013).

³⁹ Survivors of GBV may need access to police, justice, health, psychosocial, safe shelter and livelihood services to begin healing from their experience of violence. This will be arranged by the GBV Services Provider on their behalf in accordance with the survivor's wishes (see Section 5.1).

- In consultation with the GBV Services Provider, the appropriate representative from the IA is tasked with implementing the agreed upon plan which should always be in accordance with local legislation, the employment contract, and CoC.
 - Through the GBV Services Provider, the GBV complaints resolution mechanism advises the GRM operator that the case has been resolved, and it will then be closed in the GRM.
 - The IA and the World Bank will be notified that the case is closed.
116. As noted earlier, the Services Provider, and IA representatives involved in the GBV case resolution, need to understand their legal obligations when it comes to reporting GBV cases to the police. Reporting should be done in accordance with the law, especially in cases that require mandatory reporting of certain types of GBV incidents, such as sexual abuse of a minor. When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases to the GRM for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.

5.4 Ensuring Appropriate Support for Survivors

117. The support provided to survivors through GBV Services Providers should include: (i) health; (ii) psycho-social; and, (iii) legal support. Services should follow global standards and guidelines.⁴⁰
118. Any survivor reporting GBV through a reporting mechanism in a World Bank-financed IPF should receive care regardless of whether the perpetrator is known to be associated with the project or not. This is because:
- Often, the specifics of the perpetrator may not be known at the time that support services start, and once started, a survivor should be able to continue to access care.
 - The increased GBV sensitization activities linked to Bank-financed projects in the project’s adjoining communities may lead survivors in communities to seek services through the project, regardless of whether the perpetrator was linked to the project or not.⁴¹
119. With regard to the support given to the survivor from the GBV Services Provider, under the survivor-centered approach the case is only closed when the survivor no longer requires support.

5.5 Reporting to Management

120. The World Bank has recently introduced the ‘Safeguards Incident Response Toolkit’ (SIRT) to outline procedures for World Bank Staff to report negative safeguard incidents in an IPF. SIRT outlines the requirements for reporting GBV cases and has a protocol that defines incidents using three categories. “Indicative” events are addressed within the Task Team with notification to the Practice Manager and Regional Safeguards Coordinator (RSC). “Serious” events need to be elevated by the TTL to the Country Manager/Director, Global Practice Manager, Social and Environmental Practice Managers and Directors, Relevant Program Leaders, Legal, External and Corporate Relations (ECR), RSC Regional Safeguards Advisor, and Chief Environmental and Social Standards Officer (CESSO). (see SIRT Figure 2 – Event Communication Chart). Finally, in a “Severe” event, the TTL promptly notifies the CMU (Country Manager/Country Director). The CD informs the RVP, SD VP and/or other network VP if appropriate, copying the home GP Practice Manager (PM), Director and Senior Director, RSA, CESSO, E&S PMs and Directors and Senior Directors, LEGEN (with cc to the Country Lawyer), E&S specialists, RSC, and ECR.

⁴⁰ Quality standards for medical care can found at: <http://www.who.int/reproductivehealth/publications/post-violence-care-in-health-facilities/en/> Other service standards can be found at: <https://www.unfpa.org/sites/default/files/pub-pdf/GBVIE.Minimum.Standards.Publication.FINAL.ENG.pdf>

⁴¹ While some have expressed concerns that projects may engender GBV reporting, experiences have shown that reporting of GBV is generally low globally. Even though a third of women experience violence by an intimate partner, or sexual violence by a stranger, only 7 percent of women and girls experiencing GBV report the incident to a formal source (regional variations include 2 percent in India and East Asia to 14 percent in Latin America and the Caribbean).

121. The information required to meaningfully report to management on GBV cases should come from the monitoring of cases of GBV in the GRM and by reviewing regular supervision consultant's reports. As noted in Section 4.8, Task Teams should include key data on GBV in the Aide-Memoires and ISRs.

5.6 Resolving and Closing a Case

122. There are two elements related to resolving and closing a GBV case:
- The internal project system, in which the case is referred to the GBV Services Provider for survivor support, and through the established GBV resolution mechanism appropriate actions are taken against perpetrators; and,
 - The support that the survivor receives from the GBV Services Provider.
123. As described earlier, when a complaint is received, it is registered in the project GRM and referred to the GBV Services Provider with the consent of the complainant. The service providers initiate accountability proceeding with the survivor's consent.
- If the survivor does not wish to place an official complaint with the employer, the complaint is closed.
 - When the survivor proceeds with the complaint, the case is reviewed through the established GBV resolution mechanism and a course of action is agreed upon; the appropriate party who employs the perpetrator (i.e., the contractor, consultant, or IA) takes the agreed disciplinary action in accordance with local legislation, the employment contract and the CoC. Within the established resolution mechanism, it is confirmed that the action is appropriate, and then informs the GRM that the case is closed.
124. All GBV survivors who come forward before the project's closing date should be referred immediately to the GBV Services Provider for health, psycho-social and legal support. If a project closes with GBV cases still open, prior to closing the project appropriate arrangements should be made with the GBV Services Provider to ensure that there are resources to support the survivor for an appropriate time after the project has closed, and at a minimum for two years from the time such support was initiated. Funding for this cannot be provided by the project after the closing date, so other arrangements will need to be made, such as financing by the borrower, involving other projects within the portfolio that may have aligned objectives and budget flexibility—or in extreme circumstances the project closing date may need to be extended.

6. References

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Annex 1: Codes of Conduct and the GBV Action Plan

125. To build a system for GBV risk mitigation, projects must:

- Have all employees of contractors (including sub-contractors), supervision consultants and other consultants with a footprint on the ground in the project area sign CoCs;
- Have an effective GBV Action Plan so that workers understand behavior expectations and policies, as well as the accountability and reporting mechanism. This Action Plan should include training and communication. It should also include plans to make the project-affected community aware of the CoC the project-related staff have just signed; and,
- As part of the GBV Action Plan, define accountability and response protocols, which set out the procedures followed for holding individuals accountable and penalizing staff that have breached GBV policies.

Codes of Conduct

126. As the CoC establishes expectations for behavior within a company and within the community which the company serves or works in, it becomes an instrument to assist in mitigating risks related to SEA and SH. The CoC clearly defines obligations of all project staff (including sub-contractors and day workers) regarding:

- Policies related to GBV, specifically SEA and workplace SH;
- Compliance with applicable labor legislation;
- Norms and regulations of conduct for all personnel;
- An understanding that GBV is prohibited and all transgressions will be acted upon;
- The CoC should cover the commitment of the company, and the responsibilities of managers and individuals with regard to GBV, and if possible, other key issues identified in the ESA/ESMP/C-ESMP, such as ESHS and OHS; and,
- It is important that the CoC be translated into the local language.

127. To enable dissemination of the principles laid out in the CoC and the consequences of its breach, an awareness raising strategy should be attached to the CoC as part of the GBV Action Plan. Raising awareness of CoC standards should be targeted to both company personnel and the members of the project-affected community.

128. It is essential that the CoC be discussed at public consultations and its standards posted in public spaces at the contractor's work camps and living areas in local languages (see Chapter 3 on Community Consultations). It is also critical that this extend beyond the specific location where civil works are taking place into the wider project adjoining communities as defined in the project's ESA/ESMP, since neighboring communities are at risk of GBV, particularly when workers are highly mobile.

129. Consent is a crucial element of a CoC and refers to the informed choice a person makes to agree freely and voluntarily to do something. CoCs used in World Bank-financed projects must reflect these principles (see Chapter 2). In the context, while the CoC need not prohibit consensual sex with someone age 18 and above, the CoC should explicitly require that workers behave in accordance with national law.

130. The World Bank has not endorsed a 'template' CoC for projects. Indeed, the World Bank's 2017 SPDs and SBDs for International Competitive Bidding of civil works and OPRC contracts make it clear that the expectation is that bidders already have their own CoCs, or may develop them for bidding. This is reflected in the Works SPD requirement that:

"The Bidder shall submit its Code of Conduct that will apply to Contractor's Personnel (as defined in Sub-clause 1.1.2.7 of the GC), to ensure compliance with its Environmental, Social, Health and Safety (ESHS) obligations under the contract. [Note: Complete and include the risks to be addressed by the Code in accordance with Section VII-

Works' Requirements, e.g. risks associated with: labor influx, spread of communicable diseases, sexual harassment, gender based violence, sexual exploitation and abuse, illicit behavior and crime, and maintaining a safe environment etc.]

In addition, the Bidder shall detail how this Code of Conduct will be implemented. This will include: how it will be introduced into conditions of employment/engagement, what training will be provided, how it will be monitored and how the Contractor proposes to deal with any breaches.

The Contractor shall be required to implement the agreed Code of Conduct.”

131. The SPDs outline the key requirements for the Bidder's CoC as follows:

“[A minimum requirement for the Code of Conduct should be set out by the Employer, taking into consideration the issues, impacts, and mitigation measures identified, for example, in:

- *project reports e.g. ESIA/ESMP*
- *any particular GBV/SEA requirements*
- *consent/permit conditions (**regulatory authority conditions attached to any permits or approvals for the project**)*
- *required standards including World Bank Group EHS Guidelines*
- *relevant international conventions, standards or treaties, etc., national, legal and/or regulatory requirements and standards (where these represent higher standards than the WBG EHS Guidelines)*
- *relevant standards e.g. Workers' Accommodation: Process and Standards (IFC and EBRD)*
- *relevant sector standards e.g. workers accommodation*
- *grievance redress mechanisms.*

The types of issues identified could include risks associated with: labor influx, spread of communicable diseases, sexual harassment, gender-based violence, illicit behavior and crime, and maintaining a safe environment etc.]

[Amend the following instructions to the Bidder taking into account the above considerations.]

A satisfactory code of conduct will contain obligations on all Contractor's Personnel (including sub-contractors and day workers) that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns of the region, the location and the project sector or to specific project requirements. The code of conduct shall contain a statement that the term “child” / “children” means any person(s) under the age of 18 years.

The issues to be addressed include:

1. *Compliance with applicable laws, rules, and regulations*
2. *Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, and the Contractor's Personnel (including wearing prescribed personal protective equipment, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)*
3. *The use of illegal substances*
4. *Non-Discrimination in dealing with the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, and the Contractor's Personnel (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, or health status)*
5. *Interactions with the local community(ies), members of the local community (ies), and any affected person(s) (for example to convey an attitude of respect, including to their culture and traditions)*
6. *Sexual harassment (for example to prohibit use of language or behavior, in particular towards women and/or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)*

7. *Violence, including sexual and/or gender based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty).*
8. *Exploitation including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading behavior, exploitative behavior or abuse of power)*
9. *Protection of children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior towards children, limiting interactions with children, and ensuring their safety in project areas)*
10. *Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)*
11. *Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)*
12. *Respecting reasonable work instructions (including regarding environmental and social norms)*
13. *Protection and proper use of property (for example, to prohibit theft, carelessness or waste)*
14. *Duty to report violations of this Code*
15. *Non- retaliation against workers who report violations of the Code, if that report is made in good faith.*

The Code of Conduct should be written in plain language and signed by each worker to indicate that they have:

- *received a copy of the code;*
- *had the code explained to them;*
- *acknowledged that adherence to this Code of Conduct is a condition of employment; and*
- *understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.*

A copy of the code shall be displayed in a location easily accessible to the community and project affected people. It shall be provided in languages comprehensible to the local community, Contractor's Personnel, Employer's Personnel and affected persons."

Box A6.1: The Pacific Islands Transport Code of Conduct

Starting in 2014, transport projects under the 'Pacific Aviation Investment Program' (PAIP) implemented 'Child Protection' CoCs for all companies and individuals working on the project. In 2016 these were expanded to include GBV, and in 2017, further expanded to also cover ESHS and OHS:

Whereas the World Bank's 2017 SPD approach has bidders developing the CoC, under the PAIP it is the Borrower who adopts the CoC and sets it as the minimum standard to which all suppliers to the project must adhere. The CoC is applied to all activities of the project including civil works (international and domestic bidding), goods procurement, individual consultants, etc. Bidders may choose to use the Borrower's CoC in the bidding or submit their own as long as it meets the minimum requirements of the Borrower's CoC.

In addition to defining the expected behaviour, accountabilities and the response protocol for individuals, the PAIP CoCs include separate CoCs for the company and the managers. This was based on earlier experience in the transport sector with regard to HIV/AIDS, as embodied in the transport sector's 'Road to Good Health' toolkit.⁴² The resulting three levels are:

- **Company CoC:** Commits the company to addressing ESHS, OHS and GBV issues;
- **Manager's CoC:** Commits managers to implementing the Company CoC, as well as those signed by individuals; and,
- **Individual CoC:** Commits all persons—including sub-contractors and suppliers—to the standards of behavior.

Contents of a GBV Action Plan

132. As described in Chapter 4, the GBV Action Plan is used to outline the project's GBV prevention and response activities. The GBV Action Plan outlines how the project will put in place the necessary protocols and mechanisms to minimize the risk of exacerbating GBV in the project, as well as to address any GBV issues that may arise. Chapter 4 contains an outline of a GBV Action Plan.
133. Sample GBV Action Plans and other materials to support implementing the recommendations are available at: <http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx>

Annex 2: Collecting Information on GBV

134. It is generally unnecessary to undertake new surveys to determine GBV risks as key information is likely already available from country-level Demographic and Health Surveys or nationally representative standalone surveys on violence against women and girls. Eliminating various forms of violence faced by women and girls is also part of several of the Sustainable Development Goals and has led to an increase in data collection and reporting on GBV.⁴³
135. There should be **absolutely no data collection** related to GBV with anyone who may be a survivor without making referral services available to support them. If data collection is necessary, Task Teams should confirm that protocols are in place to enable referral of participants disclosing experiences of violence **before data collection commences to avoid retraumatizing survivors**. Training of researchers must cover all safety and ethical guidelines related to GBV. **No focus group discussions with community members asking about personal experiences of GBV should be undertaken**. Given that prevalence of IPV and/or non-partner sexual assault affects 35 percent of women aged 15-49, focus groups are likely to have women who are survivors of an incident of GBV. For more information on how to discuss GBV ethically see:
- The Violence Against Women and Girls Resource Guide [Ethics page](#)
 - [Ellsberg M, and Heise L. \(2005\). Researching Violence Against Women: A Practical Guide for Researchers and Activists. Washington DC, United States: World Health Organization, PATH.](#)
 - [World Health Organization \(2001\). Putting women first: Ethical and safety recommendations for research on domestic violence against women.](#)
 - [World Health Organization \(2007\). WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies.](#)
136. When data is unavailable, however, and data collection on topics related to GBV, such as help-seeking behaviors, perceptions of quality of GBV Services Providers, or safety mapping of communities is undertaken, the following guiding principles are to be followed and the ethical issues concerning GBV data collection are to be carefully considered. Only if these can be properly implemented, should data collection be done.
- The benefits to respondents or communities of documenting GBV must be greater than the risks to them.
 - The safety and security of all those involved in information gathering about GBV is of paramount concern and should be continuously monitored.
 - Information gathering and documentation must be done in a manner that presents the least risk to respondents, is methodologically sound, and builds on current experience and good practice.⁴⁴
 - Basic care and support for survivors must be available locally before commencing any activity that may involve individuals disclosing information about experiences of GBV.
 - The confidentiality of individuals who provide information about GBV must be protected at all times.
 - Anyone providing information about GBV must give informed consent before participating in the data gathering activity.
 - All members of the data collection team must be carefully selected and receive relevant and sufficient specialized training and ongoing support.
 - Additional safeguards must be put into place if children (i.e., those under 18 years) are to be the subject of information gathering.⁴⁵

⁴³ For example, <http://dhsprogram.com/What-We-Do/Survey-Types/DHS.cfm>.

⁴⁴ An example of this is the Ethical and Safety Recommendations section: <http://www.vawgresourceguide.org/resources#esr>. In particular, Ellsberg, M., and L. Heise. 2005. Researching Violence Against Women: A Practical Guide for Researchers and Activists. Washington DC, United States: World Health Organization, PATH.

⁴⁵ See recommendation 8 in World Health Organization (2007). [WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies.](#)

Annex 3: GBV in Conflict Zones—Experiences from Cameroon

137. In war zones, or areas of elevated risk of violence, it is often difficult to engage civilian contractors without some form of protection by the police and/or the national army. In extreme circumstances, contractors may not be willing to work in such areas, meaning the government is obliged to engage a specialized military or UN body to undertake the construction. This challenge was faced in the Far North Region of Cameroon as part of the Central African Economic and Monetary Community (CEMAC) Transport and Transit Facilitation Project (TTPF). The project included the rehabilitation of the Mora-Dabanga-Kousseri road, a key section of the Douala-Ndjamena corridor, in an area that had suffered from chronic fragility and recurrent Boko Haram attacks. A contractor had originally been engaged in the project, but works were halted after Boko Haram abducted some of its workers in 2014. It was therefore discussed and agreed with the Government that the Cameroonian Army Corps of Engineers would be engaged through the Ministry of Public Works to undertake the construction under a specific Output-Based-Disbursement-Force-Account arrangement.
138. World Bank-financed projects have worked with military entities in the past but had never used military-related entities to carry out construction works in an active conflict zone. Deploying military personnel to a remote and vulnerable area required a very thorough understanding of the risks and potential mitigation measures needed to address them. A local NGO specifically recruited by the World Bank undertook a detailed social risk assessment that identified, among others, a high risk of human rights violations and GBV for communities along the road. This led the team to develop some specific mitigation measures to address this risk, including:
 139. A dedicated GRM (with ability to document cases of GBV) and a social communication plan managed by that same NGO with specialized and trained staff to work on GBV prevention, identification and response engagement;
 140. Extensive community sensitization;
 - Human rights, GBV, and civil-military engagement training of military conducted by the International Crescent of the Red Cross;
 - Screening of all military personnel assigned to work on the project with specific provisions applying to all military personnel associated with the project, including clear response processes in case of violations; and,
 - Active monitoring of the project area through a Bank-financed independent TPM, along with the NGO hired to implement the GRM.
 141. The monitoring framework was complemented by a decentralized PMU and two supervision consultants. Given the engagement of the army in the construction, these specific social mitigation measures, normally reflected in the bidding documents and the contract, were reflected in the Financing Agreement of the project.
 142. For further information on the integration of GBV aspects into the project see [here](#).

Annex 4: The GBV Risk Assessment Tool

143. To help assess the risk of project-related GBV, the Gender Group alongside colleagues from various GPs have developed the GBV Risk Assessment Tool.⁴⁶ The goal of the tool is to stimulate thinking around the risk of project-related GBV. The tool draws on information from a variety of sources to give each project a risk 'score' based on the responses to each individual question. The risk score is calculated on a scale of 0 to 25: projects that score 0-12.25 are considered '**Low**' risk; 12.5-16 '**Moderate**' risk; and projects that score 16.25-18 represent a '**Substantial**' risk, and project that score 18-25 are considered '**High**' risk projects. Projects that are in preparation use sections A and B and aggregate the scores for each section, which can be completed during the PCN phase. On the basis of the additional information gathered during project preparation, the risk should be updated as appropriate for the Quality Enhancement Review (QER) meeting or at the Decision Review meeting.
144. This tool does not address how the project itself may promote gender equality and reduce GBV through its activities. Rather, this is an attempt to reduce GBV and particularly, the risk of SEA, and allow Task Teams to determine the risk level of a project to increase GBV.
145. The tool is comprised of the following sections:
- Section A provides an overview of the '**Country context**' specifically related to the country's commitment to gender equality and national incidence of violence.
 - Section B, '**Project context**', is critical since no matter what the country context, the project in itself can create new risks and vulnerabilities for GBV that may not have existed before. This section is weighted more heavily than section A.
146. It is important to note that none of the indicators in the tool can alone predict GBV, nor does having a good score on any one indicator protect a project from the risk of exacerbating GBV. No matter what the project context, Bank projects can influence the risk of GBV, often increasing it, by virtue of shifting existing power dynamics and financial relationships. A lower risk score does not mean that the project does not carry any danger of exacerbating GBV; a high-risk score does not mean that the project cannot proceed. Rather, this is a tool to help Task Teams to think about the types of measures needed to prevent GBV and adequate response provisions that can be implemented to best accommodate their project setting.
147. The tool contains indicators on GBV against which Task Teams assess their project. For example, the first two indicators under Section A provide an estimate of how prevalent IPV and any sexual violence perpetrated by a partner or a non-partner is at the national level. The first indicator 'Prevalence intimate partner violence' is intended to give an overview of levels of violence against women in the country. No direct correlation has been established between the risk of SEA within a project and the levels of violence against women and girls in countries; however, this statistic is important for giving a sense of the country context within which the project occurs. The national IPV prevalence is compared with the regional average as per WHO regional estimates (2013). To assess the risk, higher risk is where national IPV prevalence is above the regional average⁴⁷ and lower risk is where national IPV prevalence is below the regional average (Figure 6). Section A will be pre-populated to provide context for Task Teams on the country's commitment to gender equality and national incidence of violence.

⁴⁶ In addition, an accompanying Risk Assessment Methodology Guidance Note provides greater detail and guidance for the Risk Assessment Tool and can be found [here](#).

⁴⁷ Per WHO 2013.

Item Number	P# Here:								<--TTLS: Fill out the cells in yellow
	Project Name Here								
Characteristic	Measure	Rating	Numeric Rating	Possible scoring	Low Score	Medium Score	High Score		
Section A: Country Context									
Country-level violence background									
1	Prevalence intimate partner violence (select the country then in the "Common Indicators" tab and scroll to "Physical or sexual violence by a husband/partner")				0 (below regional average), 1 (above regional average)	0		0.5	Regional IPV average is 41.75%
2	Prevalence of any form of sexual violence (select the country then in the "Complete List" tab and click the "Domestic Violence" tab. Select the "Experience of sexual violence" option, then select "Women who ever experience sexual violence" option)				Higher Risk is having IPV prevalence above regional average per WHO 2013 (See Table 2, Annex 1). Lower Risk is having IPV prevalence below the regional average per WHO 2013 (See Table 2, Annex 1)	0		1.0	Regional sexual violence prevalence by non-partner 9.15%
3	State Department Trafficking in Persons report (Tier 1-3, with one low and 3 high risk)				Lower risk is Tier I Medium risk is Tier II Higher risk is Tier III and Tier II watch-list	0	0.25	0.5	
4	Presence of Peace-keeping mission				0 if there is no mission, 1 if there is a mission	0		0.5	

Figure 6. GBV Risk Assessment Tool Section A - Country Context – Questions 1-13

148. Task Teams fill out Section B, on project-related risks and vulnerabilities for GBV (Figure 7). For example, the tool contains the indicator on the level of infrastructure construction to capture whether the project includes any infrastructure construction or upgrading, as such projects can change the community’s landscape and use of space, social dynamics, and labor influx, and can affect the safety of workers involved in the construction as well as of women, girls and boys using or living in the surrounding areas. Higher risk is where there are major or substantial construction works, while lower risk would have small amounts of construction works.

Section B: Project Context									
14	Is project in a humanitarian area of the country? Go to Country in the "Countries" tab--> click on Map of the country and view "Maps & Infographics section" and "Updates" for latest humanitarian and emergency situation.				Higher risk is humanitarian or emergency situation in project area Lower risk is no presence of humanitarian or emergency situation in project area	0		2	
15	How much infrastructure construction, upgrading or rehabilitation does your project entail? (major = higher risk, medium quantity= medium risk, small amount=lower risk)				Lower risk is No Higher risk is Yes	0		1	
16	According to the guidance from the labor influx note, rate your project as high, medium or low risk related to the level of labor influx. If there is no labor influx, choose the low risk option.				Low, medium and high (self judgement) as per guidance criteria: Higher risk can be associated with large number of workers, small remote community (low absorption capacity)/context with pre-existing social conflicts, high prevalence of GBV, weak law enforcement, presence of specific marginalized, vulnerable, ethnic groups	0	1	2	

Figure 7. GBV Risk Assessment Tool Section B - Project Context Questions 14-25

Annex 5: Addressing GBV in the Contractor's ESMP

149. As described in Chapters 3 and 4, the project's ESMP for addressing GBV risks. **Figure 8** shows the overall process from preparation through to construction.

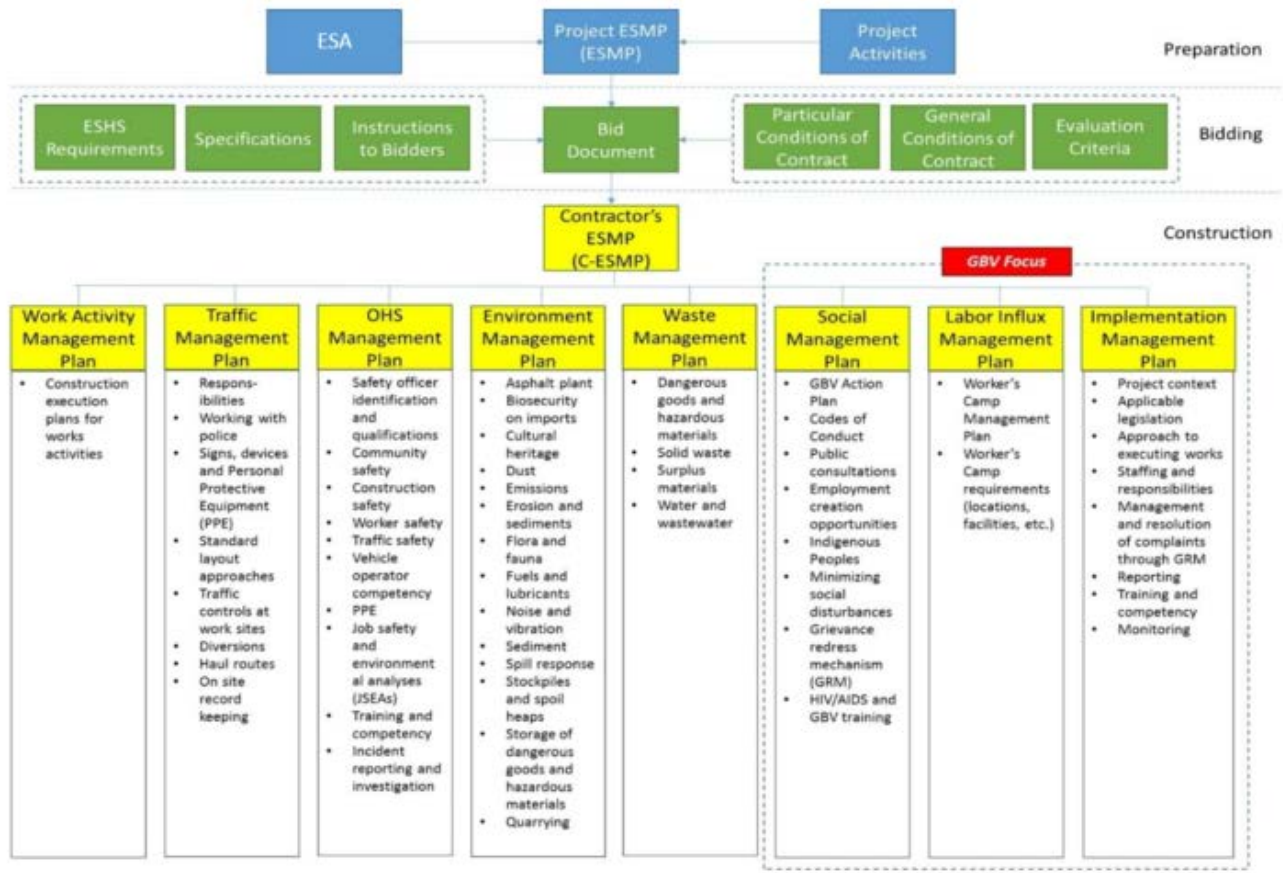


Figure 8: Managing Environmental and Social Risk from Project Preparation to Construction

150. During preparation, the ESA (if prepared) and project ESMP are prepared by the Borrower, publicly consulted on, reviewed and cleared by the World Bank, and publicly disclosed. The Borrower is required to implement the project ESMP as part of the World Bank's Financing Agreement with the Borrower. The project's ESMP principles are embodied in the project's ESHS requirements, specifications, along with the other procurement related elements to form the bidding documents, with the project ESMP often included as part of the bidding document.
151. In the bid, contractors have to provide a number of management plans⁴⁸ and these ultimately become part of the C-ESMP which the contractor must follow during civil works. The management plans will vary depending upon the nature of the projects, but GBV needs to be included as appropriate (see **Figure 8**).
152. The C-ESMP is the plan prepared by the contractor outlining how it will implement the works activities in accordance with the ESMP's requirements and in accordance with the contract. A cornerstone for addressing GBV, and more broadly the ESHS risks, during implementation is the development of an effective C-ESMP. Contractually,

⁴⁸ As part of the bid, the contractor submits Management Strategies, Implementation Plans, and a CoC. The contractor also submits, on a continuing basis, for the Engineer's prior approval, such supplementary Management Strategies and Implementation Plans as are necessary to manage the ESHS risks and impacts of ongoing works. These Management Strategies and Implementation Plans collectively comprise the C-ESMP.

the contractor must follow the C-ESMP, which is why it is important that the C-ESMP build upon the findings and proposed measures identified in the project ESA and ESMP.

153. The C-ESMP should include:

- **Implementation of GBV Action Plan and Accountability and Response Framework:** As described in Chapter 4, this is the detailed plan by which the contractor will implement the GBV Action Plan outlined in the project ESMP;
- **Code of Conduct:** The agreed CoC to address behavior which will be used on the project for the contractor's workers, including sub-contractors and suppliers;
- **Training Plan:** The plan for training workers on GBV;
- **Community Consultation Plan:** The strategy by which—in consultation with the IA—the local communities in the project's adjoining communities will be advised on the project activities, how to make complaints, as well as GBV support services; and,
- **Labor Influx Management Plan:** Should the project involve the influx of labor, how this influx will be managed—particularly to address GBV risks.

154. To ensure that the GBV risks are managed, it is important that:

- The contractor should prepare the C-ESMP in accordance with the requirements of the project ESMP. The C-ESMP should provide a detailed explanation of how the contractor will comply with the project's safeguard requirements (embodied in the ESMP) and demonstrate that sufficient funds are budgeted for that purpose.
- The contractor not carry out **any** works, including mobilization and/or pre-construction activities (e.g., limited clearance for haul roads, site accesses and work site establishment, geotechnical investigations or investigations to select ancillary features such as quarries and borrow pits), unless the Supervision consultant⁴⁹ is satisfied that appropriate measures are in place to address GBV risks and impacts through the C-ESMP.⁵⁰
- Public consultations be held on the C-ESMP, with the active participation of the contractor⁵¹ and the supervision consultant's safeguard specialist. These consultations must be well documented and include separate consultations with women and girls.
- The World Bank's safeguard and technical specialists review the C-ESMP and provide the Bank's technical 'no objection' to it being used.⁵²
- The C-ESMP may be publicly disclosed on the Borrower's project web site, and at other local locations.⁵³

155. The approved C-ESMP be reviewed periodically (typically not less than every six months), and updated in a timely manner, as required, by the contractor so that it contains measures appropriate to the works activities to be

⁴⁹ Under the FIDIC contract, which is commonly used for supervising civil works financed by the World Bank, the "Engineer" is the client's representative who is responsible to watch and supervise works, and test and examine materials to be used and workmanship employed in connection with the works. As part of the supervision team, there is the appointed "Engineer," who is often supported by "resident engineers" in the field. Other members of the supervision team include safeguard specialists.

⁵⁰ With the agreement of the client and Engineer, a staged C-ESMP may be prepared addressing specific agreed activities (e.g., mobilization). However, mobilization should not commence until GBV and labor influx management elements of the C-ESMP have been approved.

⁵¹ Wording such as this should be included in the bidding document: "The Contractor shall participate in public consultations on the C-ESMP by attending public meetings at its own expense as requested by the Engineer to discuss the C-ESMP or any other aspects of the project's environmental and social compliance of interest to the public."

⁵² While this is not a required Bank policy, it is good practice.

⁵³ Based on advice from the Legal Vice Presidency, while the project ESMP is disclosed by the World Bank through the external website, this should not be done for the C-ESMP.

undertaken. The updated C-ESMP is subject to prior approval by the Supervision consultant, and ideally redisclosed on the IA's web site.

156. The C-ESMP must include specific mitigation measures based on the ESMP, the final project design, the proposed construction method statements, the nature of the project site, etc. As shown in **Figure 8**, the C-ESMP should include specific management plans addressing the various risks of the project. GBV is usually addressed as part of the overall 'Social Management Plan', which identifies how to manage the impact of the project on the local community and workers.⁵⁴ For high risk situations, the C-ESMP should include a labor influx plan to manage the impacts of labor influx on communities, especially with regard to GBV including SEA.⁵⁵

⁵⁴ Examples of Action Plans are at: <http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx>.

⁵⁵ Examples of ESMPs are at: <https://tinyurl.com/esmps-C-ESMPs>.

Annex 6: Working with GBV Services Providers

157. One of the most effective ways of addressing GBV lies in working with GBV Services Providers and community organizations that are able to support the project in addressing any cases of GBV that may arise in the context of a project, while also working to understand increased risks and proactively prevent GBV that arises in the context of a project. Prior to project appraisal, teams therefore need to identify organization(s) (e.g., NGOs and local institutions) who are trusted by the local community and are working on GBV prevention and response. In areas with high GBV prevalence, there may already be an existing mapping of GBV prevention and response actors in a given community. Coordination with local women's organizations, government stakeholders (e.g., Ministry of Women's Affairs, Ministry of Health, etc.) and United Nations (UN) agencies is essential.
158. GBV Services Providers for survivors of GBV should be identified in accordance with [international standards that articulate a minimum basic package of services](#), ideally including case management support, health services, psychosocial support, police support and security, access to legal services, and shelter, if needed. When identifying GBV Services Providers, the quality of service provision should be a key consideration.
159. In keeping with a survivor-centered approach, accessing services should be the choice of the survivor. Access to police and justice services should be made available in the instance that the survivor would like to pursue charges through the local justice system.
160. It is important to map community organizations working on women's and girls' rights as they may be both entry points to services for survivors and useful allies for awareness raising activities around the CoCs. When identifying community-based organizations, look for those with experience working with the local population to address the root causes of GBV by providing livelihood support or by implementing community-based interventions to challenge the norms and attitudes that underlie GBV. These two activities fall under the broad categories of GBV prevention and response.
161. The activities that GBV Services Providers will provide a project will depend upon the risk level. These can include the following:
 - Undertaking a community mapping of GBV risk 'hot spots' and vulnerable target groups⁵⁶ that may be most susceptible to GBV arises in the context of the project, particularly SEA;
 - In consultation with the IA, on the basis of the community mapping, identifying the specific GBV prevention activities to be undertaken to address GBV risks (see Section 2 for the types of risks to be considered);
 - Providing services to survivors and/or becoming a victim advocate/victim accompaniment, case management organization. If required and in High risk situations, the project should equip this organization with funds that will enable it to facilitate access to timely, safe and confidential services for the survivor (including money for transportation, documentation fees, and lodging if needed);
 - Providing training related to ensuring knowledge of standards laid out in the CoC and services that are available for survivors;
 - Ensuring that the project has 'safe spaces' where survivors can report incidents of GBV to trained personnel;
 - Raising awareness around the existing accountability mechanisms and supporting the development of a Stakeholder Engagement Plan; and,
 - Channeling complaints to the appropriate accountability mechanism (see Annex 7).
162. **Contracting the GBV Services Provider.** Experience has shown that the most effective approach is for the IA to hire the GBV Services Provider. Among the advantages of this approach are:
 - The same GBV Services Provider can be used for multiple contractors, which is not only more cost effective, but also helps ensure consistent provision of services across the project.

⁵⁶ For example, young women, aged 13-25 – specifically targeting school-aged girls and youth groups; young women, aged 25-35; young men, aged 14-25, school-aged boys and men who have sex with men; and commercial sex workers (particularly for HIV/AIDs).

- The GBV Services Provider can be contracted and mobilized well in advance of the contractor, thereby avoiding any risks of gaps in support during the initial stages of the project.
 - Having the GBV Services Provider report directly to the IA will make it easier to ensure quality control and consistency of service delivery.
163. Ideally the GBV Services Provider would also cover HIV/AIDS support services—but not all have the capabilities to do so. In High GBV risk contexts, it may be advisable to put a GBV Services Provider/NGO under contract to the IA to provide a range of GBV prevention services throughout the life of the project, as well as case referral services if cases of GBV arise under the project. In other (somewhat less risky) circumstances, it may be more appropriate to require the IA to hire a fulltime GBV specialist (typically as part of its PMU) to ensure the provisions are being adhered to appropriately.
164. Sample TOR (both for GBV Services Providers/NGOs and for GBV specialists hired by the IA) are provided at: <http://globalpractices.worldbank.org/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx>

Annex 7: GBV in Grievance Redress Mechanisms

165. The World Bank's ESF requires that: "the Borrower [is] to provide a grievance mechanism, process, or procedure to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project, in particular about the Borrower's environmental and social performance. A grievance mechanism will be proportionate to the risks and impacts of the project." ESS 10 defines the requirements of a GRM, which are meant to apply to all aspects of the project,⁵⁷ not just GBV.
166. Annex 1 of ESS10 proposes that a GRM should have:
- Different ways in which users can submit their grievances, which may include submissions in person, by phone, text message, mail, email or via a website;
 - A log where grievances are registered in writing and maintained as a database;
 - Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response and resolution of their grievances;
 - Transparency about the grievance procedure, governing structure and decisionmakers;
 - An appeals process (including the national judiciary) to which unsatisfied grievances may be referred when resolution of grievance has not been achieved; and,
 - An option for mediation when users are not satisfied with the proposed resolution.
167. The costs of operating the GRM are usually modest and should be financed by the IA as part of the general project management costs. The GRM needs to be in place prior to the contractor mobilizing.
168. The GRM needs to have multiple channels where complaints can be registered. Particularly for GBV, where risks of stigmatization, rejection and reprisals against survivors create and reinforce a culture of silence, complainants may be reticent to directly approach the project management team. Additional measures may therefore be needed to enable reporting.
169. The GRM is either operated by the IA or, for GBV, in some instances by the GBV Services Provider. Figure A9.1 is an example of this from the Vanuatu Aviation Investment Project and Figure A9.2 from the Mozambique Integrated Feeder Road Development Project.
170. IT-based solutions have been used on transport projects to implement the GRM, including: (i) the Grievance Complaint Logging System (GCLS), an Open Source/Joomla system implemented on Pacific Island Country transport projects;⁵⁸ and (ii) the Feedback Resolve implemented for Albania transport projects.⁵⁹ Using IT-based solutions also helps projects to meet the World Bank's goals of improving citizen engagement.⁶⁰
171. When trying to integrate avenues for GBV-related complaints into a project GRM, thought has to be given to the sensitive nature of these complaints and how and by whom these will be managed, and actions taken. Above all key is **not** to collect data on any type of GBV through a project GRM unless a referral to a GBV Services Providers can be made, and the GRM operators are trained on how to collect GBV cases confidentially and empathetically (with no judgement). If both of those requirements are met, the GRM should not ask for, or record, information on no more than three aspects related to the GBV incident:
- The nature of the complaint (what the complainant says in her/his own words without direct questioning);

⁵⁷ ESF 10 notes that the same GRM can be used for land acquisition and resettlement (ESS5) and Indigenous Peoples (ESS7), but recommends a separate one for project workers under ESS2.

⁵⁸ www.isafeguards.com

⁵⁹ <http://rrugadixhitale.al>

⁶⁰ The November 2014 "Results Framework and M&E Guidance Note, Annex 4" contains indicative citizen engagement indicators for Bank-financed projects. An effective GRM will allow projects to potentially address up to three of the proposed indicators: (i) grievances registered related to delivery of project benefits that are addressed (%); (ii) grievances responded to and/or resolved within the stipulated service standards (%); and (iii) project-supported organization(s) publishing periodic reports on GRM and how issues were resolved [including resolution rates] (Yes/No).

- The age of the survivor; and,
- If, to the best of their knowledge, the perpetrator was associated with the project.

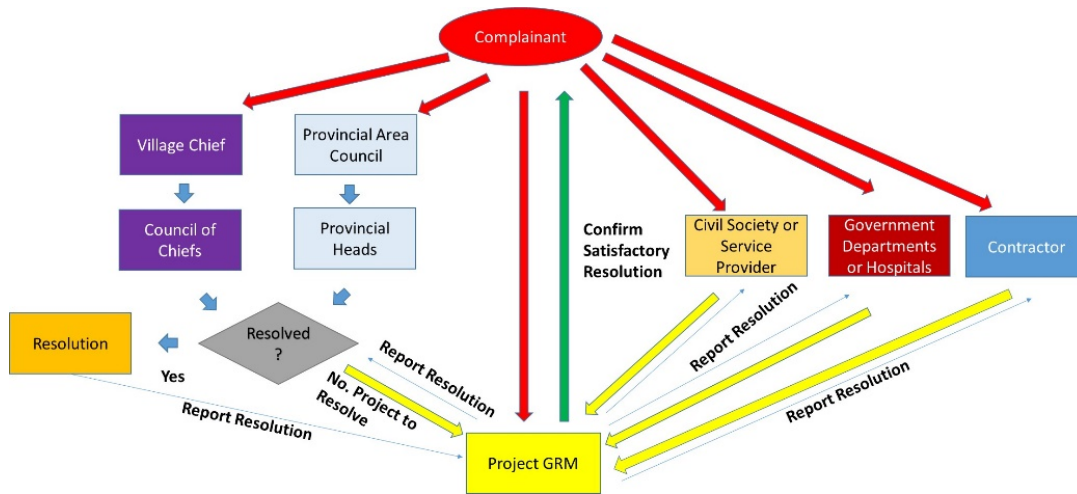


Figure A9.1: Example of Complaint Channels for Vanuatu Aviation Investment Project

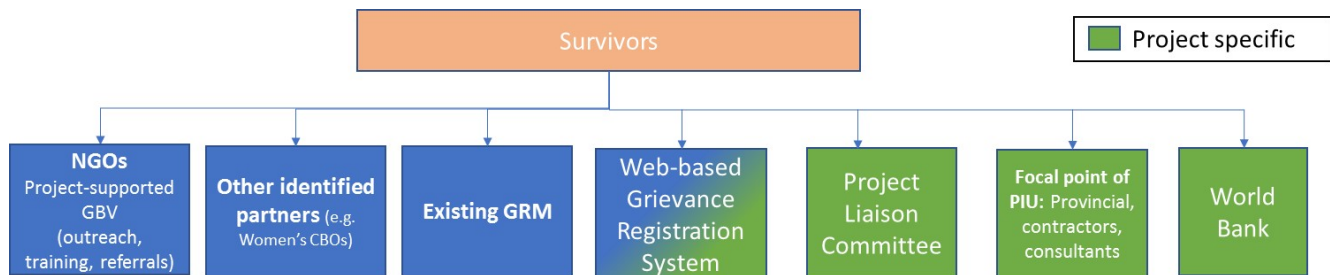


Figure A9.2: Entry Points for Sexual Exploitation and Abuse Survivors to Access Project in Mozambique Road Project

172. Any complaint of GBV, unless the complaint was received through the GBV Services Provider, should immediately be referred to the GBV Services Provider⁶¹. It is up to the survivor, and only the survivor, whether to take up the referral.
173. Two options for addressing GBV in the GRM process include:
174. Have it as part of the overall project GRM (an example from the Vanuatu Aviation Investment Project is in Figure A9.3); or,
175. Have an independent GRM for GBV cases operated by the GBV Services Provider as part of the support services that are financed under the project.
176. There are advantages and disadvantages with both, and the approach selected will depend upon the specific situation and capabilities of the GBV Services Provider. A key consideration is the ability to provide the necessary channels for receiving complaints (i.e., there has to be a wide range of avenues to make complaints if the survivor desires to register the incident in the GRM). Having a single project GRM provides a single channel for all issues concerning the project so it is easier to manage and to promote to the local communities. This requires, however,

⁶¹ It does not matter whether the GBV complaint is project-related, all complaints should be referred.

that the information be carefully managed so that confidentiality is protected, and the GRM operators must be properly trained.

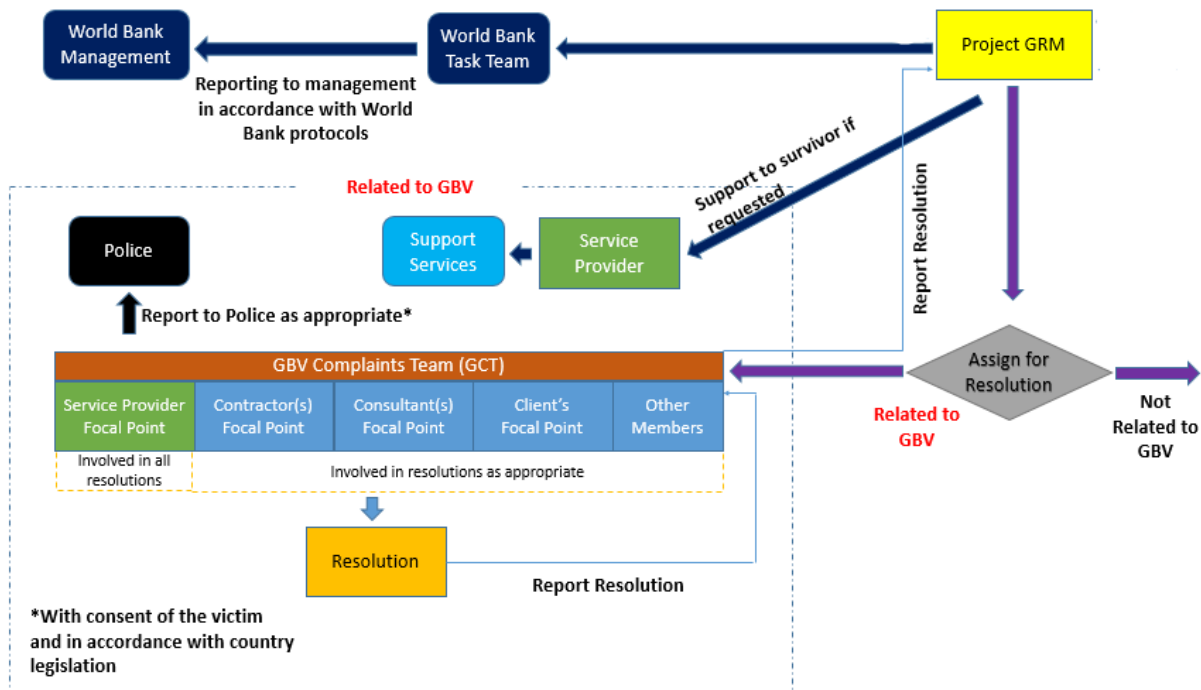


Figure A9.3: Vanuatu Aviation Investment Project GBV Complaint Resolution Process

177. Figure A9.3 also shows an approach that has been applied in the Vanuatu Aviation Investment Project to address a GBV complaint:

- The Task Team is advised of a complaint by the GRM operator or another party and the task team advises management in accordance with the required reporting protocols;
- The survivor is referred by the GRM operator to the GBV Services Provider for support;
- The complaint is referred to the GBV Complaints Team (GCT) which:
 - Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
 - Refers the case to the police as appropriate (see Chapter 5).
 - Assigns the appropriate ‘Focal Point⁶²’ to implement the actions—with the assistance of the GBV Services Provider—in accordance with their employment contract.
 - Upon resolution, the Focal Point and GBV Services Provider advise the GCT that it has been resolved, who in turn advise the GRM operator.
 - The GRM operator notes the resolution and closes the case.

⁶² Focal Points can be HR representative experienced in handling staff and knowledgeable of the CoC and accountability mechanisms.

Annex 8: Using Technology to Address GBV

178. There are several ways technology can be used to raise awareness of GBV, help mitigate GBV risks, and enable better monitoring and response to GBV incidences. It is important to note that social media should **not** be used, e.g. for monitoring or as an alert mechanism, as confidentiality and security of GBV survivors is paramount.
179. Some examples of technologies that have been developed externally and by World Bank Task Teams are:
 - **Great Lakes Trade Facilitation Project: Leveraging technology to measure and monitor GBV risks.** Small-scale cross-border trade is a key source of livelihoods for many in the developing world. In Sub-Saharan Africa, the vast majority of those traders are women. Every day, they cross borders multiple times to trade in goods and also services, facing risks of abuse and exploitation including SH and other forms of GBV. In response to such challenges, the World Bank is currently supporting various measures, including the implementation of the 'Great Lakes Trade Facilitation Project' (GLTFP). Active at selected borders between the Democratic Republic of Congo, Rwanda, and Uganda, and with plans for extensions to others in Burundi, Tanzania, and Zambia, the intervention aims at facilitating small-scale cross-border trade through infrastructural improvements, policy and procedural reforms, capacity building, an awareness-raising, along with other measures to improve behavior at target border locations and to prevent and mitigate GBV risks. Some GLTFP measures rely on state-of-the-art technology. In each target country, for instance, the project supports the establishment of national toll-free phone line systems to allow traders, and especially women, to anonymously report abuses suffered at the border, both via SMS and voice calls, using basic GSM handsets with no access to the internet. Reports would then be automatically stored in and processed by a cloud-based, open-source platform, and subsequently visualized on a website available in two versions: one open to the public, providing details and updates on the status of each issue, that can be used for monitoring and advocacy purposes; and a second, private and only accessible through log-in credentials, which offers selected stakeholders, e.g., border agencies, traders' associations and civil society the opportunity to review and take action on the various issues reported by traders. In order to preserve their privacy and to minimize the risk of retaliation, the system is also designed in such a way that all reports are submitted and reviewed in total anonymity.
180. **GBV module of the Grievance and Complaint Logging System:** The Grievance and Complaint Logging System (GCLS) is a free and open-source database system developed by [the Pacific Transport team](#) to receive and manage complaints. The system has an add-in module that allows survivors of GBV to safely and securely submit their grievance through the project website. On the backend where complaints are processed, the name of the survivor and the grievance are encrypted and can only be accessed through a one-time access password that is sent to a pre-configured email address managed by the responsible grievance manager or GBV Services Provider. A copy of the anonymized complaint is also directly submitted to the responsible Task Team Leader.
181. **Road Safety app:** [A transport team in India](#) led the development of a Road Safety app which has a special focus on women's safety. The road safety solution comprises two parts: (i) a mobile app for citizens; and (ii) a control room application for road safety authorities. The mobile app is used by citizens to alert friends and authorities when in need. It has an easy-to-use interface, from which a person who has met with an accident or is a victim of a street crime can choose the appropriate option, with immediate alerts sent to the relevant nearby authorities and to a pre-configured set of family members. In case of incidents of stalking or violence against women and girls, where it may not be possible to open the app on the mobile, the team developed an option whereby women can press a button on a smart amulet (that can be worn conspicuously as a piece of jewelry) to trigger the alert.
182. **Circle of 6:** Circle of 6 is an app that lets users choose six trusted friends to add to a 'circle' to whom the user can automatically send a pre-programmed SMS alert message with the user's location when in a risky or uncomfortable situation. In dangerous and critical situations there are also two pre-programmed national hotlines or local emergency numbers which are called.
183. **myPlan App:** The 'myPlan' is a mobile app to help with safety decisions if a person is experiencing abuse in an intimate relationship. Through the password protected app, a set of personalized questions are asked of survivors to provide guidance on different options available to them to protect themselves.

Annex 9: GBV Training Programs

184. There are some key principles that should be considered when developing the training program:

- **Who:** The GBV training program should be aimed at the target groups identified in the GBV Action Plan. Typically, these are: (i) workers, both from the contractor and sub-contractors; (ii) consultants, such as the supervision consultants or others working in the project area; and, (iii) IA staff involved with the project. Managers are particularly important to train as they have the responsibility for ensuring compliance of staff with the CoCs as well as implementing sanctions for transgressions. Training on GBV should also be done within the project's adjoining communities.
- **When:** All employees should attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to address GBV, and the project's GBV CoC. The sanctions embodied in the CoC need to be clearly explained. It should be noted that the induction course will need to be repeated on a regular basis as new staff start on the project.
- **How Often:** It is recommended that all employees attend a mandatory training course (no more frequently than monthly) for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's GBV goals.

185. At a minimum training should include (see examples of actual training courses at the end of this annex):

- Definition of GBV, in particular SEA and SH, and how the project can exacerbate GBV;
- Roles and responsibilities of actors involved in the project (the standards of conduct for project-related staff should be captured in a CoC);
- Case reporting mechanism, accountability structures, and referral procedures within agencies and for community members to report cases related to project staff;
- Services available for survivors of GBV; and,
- Follow-up activities to reinforce training content.

Case Study 1: GBV Training in Tuvalu

In Tuvalu, the Tuvalu Aviation Investment Project Additional Finance III was the first transport project in the Pacific Islands to use project funds to incorporate "enhanced GBV and VAC training, prevention and support activities." The project allocated USD200,000 for these specific activities and an indicator within the results framework for "Successful implementation of the GBV and VAC program." The GBV and VAC program consists of three pillars: (i) needs assessment, which includes in country consultations, regional partner consultations and a community mapping of high risk areas and available services; (ii) prevention, which includes a CoC, training of workers and managers and community awareness raising activities; and (iii) support services, which includes support for survivors and a series of capacity building trainings for GBV Services Providers.

Under the prevention activities, the IA and contractor are working with the Gender Affairs Department of Tuvalu to deliver worker and manager trainings (see training program below). All workers and managers are required to attend an induction training on GBV and VAC prior to commencing work to reinforce their understanding of the GBV and VAC CoC. Additionally, the worker and manager trainings are designed to sensitize workers on GBV and VAC, the reasons why GBV and VAC occur, gender issues, power dynamics, Tuvalu's laws, available support services for survivors and reporting mechanisms. Managers are required to attend a manager training so that they are familiar with their roles and responsibilities in upholding the CoC and to provide them with the necessary understanding and technical support needed to develop a plan for addressing GBV and VAC throughout the lifetime of the project. The training will also help them better understand their position, power and role as leaders. Refresher trainings for workers and managers are held every other month throughout the duration of the project as separate trainings with the Gender Affairs Department but also during toolbox meetings for consistent and constant messaging.

186. Managers will require additional training to ensure that they are familiar with their roles and responsibilities in upholding the GBV CoC. Managers should be required to attend and assist project facilitated training courses for all employees. Ideally, managers should introduce the trainings and announce the learning evaluations, which should include questions on training quality and a section for suggestions on improving the effectiveness of training. This will help ensure that staff see the importance of the training activities.

187. The project will also need to train:

- The GRM operator for how to handle GBV complaints in a survivor-centered manner; and,
- Any focal points that are part of the GBV case resolution mechanism will need training on empathetic and non-judgmental listening.

Case Study 2: GBV Training in Uganda

In Uganda, a Bank team trained 55 representatives from various government ministries and agencies—ministries such as Energy, Transport, Urban, Education, and Gender, Labor, and Social Development, in April 2017. The two-day training had two goals: the first was to expand the capacity of World Bank staff and their counterparts to address the important issues of GBV within IPF with major civil works; and the second was to enable the workshop’s participants to develop roadmaps for concrete action, using guidance and recommendations found in the Violence Against Women and Girls Resource Guide.

The workshop included having participants address the ecological model for partner violence, using group discussions and ‘Post-It Notes’ to identify key risk factors that intersect with the projects their ministries head. Groups discussed how early marriage, poverty, the lack of land titles, low literacy rates, cultural beliefs, and harmful norms could all be risk factors and drivers of GBV operating in their project-affected communities.

Participants were also given an overview of the [Violence Against Women and Girls Resource Guide](#), which explain how to initiate, integrate, and innovate on measures to prevent and respond to violence against women and girls. Working in groups by sector, participants applied these and other tools to develop roadmaps for different government agencies to use in the implementation of GBV Action Plans, focusing on:

- Working with contractors to prevent SH in the workplace (as well as within the agency and the contracting firms) and other forms of GBV in the project-affected communities (for example, through CoC);
- Strengthening GRMs and other monitoring mechanisms to provide safe and ethical reporting systems for people wishing to report cases of GBV, and their linkage with adequate response; and,
- Promoting interventions to reduce the level of tolerance to GBV by contributing to community mobilization around project sites, including the use of partnerships with NGOs, national and local authorities and other leaders.

Participants concluded that all projects need to guard against GBV. During the sessions, participants opened up about their personal and professional journeys toward a better understanding of the significance of GBV. One participant, a transport engineer, said he had come to realize his job was not only about building roads, it was also about understanding the impact a project had on the communities around the project site, and about managing social risks, especially for women and children. Since the training several agencies have proactively incorporated activities to mitigate the risk of GBV their projects may exacerbate. For example, the Ministry of Energy has asked workers to sign CoC and reinforces the messaging of the CoC in daily toolbox meetings. Moreover, the ministries are not just seeing their operations as a potential for increasing risks of GBV, they are approaching GBV as an area where they can contribute positive change and are committed to playing a part in the elimination of violence against women and girls in Uganda.

Tuvalu - Half Day Manager's GBV Training Program

Time	Topics	Group Work/Tools to Train
0800- 0830	Welcome	<ul style="list-style-type: none"> Opening of training, and introduction of program, and participants
0830-0930	Role of a Manager while in Vanuatu Role of a Leader	<ul style="list-style-type: none"> Each manager writes thoughts and sticks notes on butcher paper Discussion
0930-1000	Code of Conduct, do we understand it?	<ul style="list-style-type: none"> Have copies available, and read through Code of Conduct and Action Plan Re-enforce the Code of Conduct - Highlight the role of a leader, emphasize role for the safety and protection of workers against abuse and exploitation and from exploiting and abusing others What are the organizational responsibilities? Managers are not meant to be police officers and do not have to fill that role. Goal is to promote a positive, safe and respectful work environment and surrounding
1030-1230	CARE of Staff: Violence Against Women and Children (VAWC), Child Sexual Abuse, Exploitation	<ul style="list-style-type: none"> Group work on planning a Response Protocol for what a Manager will do if abuse has taken place by one staff, or on one staff Print out VAWC and GRM referral pathways chart and distribute to managers

Tuvalu - Full Day Worker's GBV Training Program

Time	Topics	Group Work/Tool to Train
0800-0830	Welcome	<ul style="list-style-type: none"> • Short word of welcome • Participants Introduce themselves • All participants fill out pre-training baseline survey (only for induction sessions)
0830-0930	Understanding Gender & Violence Against Women in Vanuatu	<ul style="list-style-type: none"> • PowerPoint slide on referral pathways from VAWC Research Results of 2009 on 'Women's Lives & Family Relationships' • One of the following exercises: <ul style="list-style-type: none"> - Group Work: Perception of Women & Men in Vanuatu - Group Work: Power Dynamics (Tool 17 from Road to Good Health)
0930-1045	Types of Violence against Women and Children	<ul style="list-style-type: none"> • Definitions of the types of violence – GBV, VAC, Domestic Violence(DV)/IPV, Family and Sexual Violence (FSV) <ul style="list-style-type: none"> - Rape - Sexual assault (including transactional sex) - Physical assault - Emotional/psychological assault (withholding resources) - Sexual harassment - Cover the definitions used in Codes of Conduct and Vanuatu • Group Work: Norms and social acceptance of violence - Impacts of GBV/FSV, VAWC and DV/IPV on Offender, Victim/Survivor, their Family, Community – how this leads to a culture of violence
1045-1100 Tea Break		
1100-1130	Understanding Laws: Family Protection Act and Penal Code	<ul style="list-style-type: none"> • What is consent? National and international laws on consent and legal age to give consent. Code of Conduct stance on consent
1130-1200	The GRM and Reporting Cases	<ul style="list-style-type: none"> • Penal Code and Family Protection Act, Application for Family Protection Orders (FPO) • How to use the GRM for reporting cases: How and who can you report to? VAIP, VPMU, VAWC, police, etc.
1200-1230	VAWC Services	<ul style="list-style-type: none"> • Accountability and confidentiality of all reporters and survivors • Linkages to Code of Conduct • VAWC Counselling & Support Services – How to seek help and/or refer people to VAWC • Services provided by VAWC for survivors of violence • What other support services exist in Port Vila?
1230-1330 Lunch Break		
1330-1415	GBV and VAC Codes of Conduct	<ul style="list-style-type: none"> • Code of Conduct: Do we understand it? Questions on Codes of Conduct? • Read through copies of Codes of Conduct and ensure participants understand it • Potential sanctions and penalties
1415-1445	Summarize, Evaluation and Close	<ul style="list-style-type: none"> • Open forum to summarize and reflect on training • Workshop Evaluation (after every session) • Evaluation through post-training survey (only before worker leaves project) • Closing