Government of the People's Republic of Bangladesh

Local Government Engineering Department (LGED)
Bangladesh Water Development Board (BWDB)
Social Development Foundation (SDF)
Department of Disaster Management (DDM)
Department of Agricultural Extension (DAE) and Bangladesh Agricultural Development Corporation (BADC)

Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project (B-STRONG)

Project Code: P508058

Gender and Sexual Exploitation and Abuse and Sexual Harassment Prevention Plan

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1: Introduction and Project Description

1.1 Introduction

Bangladesh experienced extreme rainfall from mid-August to mid-September 2024, resulting in significant flooding that affected nearly six million people[1] and caused damages of at least US$1.676 billion.[2] The floods severely impacted 11 eastern districts.[3] Infrastructure, housing, education, health, agriculture, fisheries, and livestock sectors were critically affected. Bangladesh had been facing a series of disasters, including Cyclone Remal (May 2024), the northeastern flood (June 2024), and the northern riverine monsoon flood (July 2024), which together impacted more than 18 million people.[4] More broadly, the Global Climate Risk Index ranks Bangladesh as the seventh most affected country between 2000-2019[5].

In August 2024, a massive flood occurred in the eastern part of the country. The flood can be attributed to a very severe rainfall event between August 20-25, 2024. A peak daily rainfall of 200 to 300 millimeters was observed with a total rainfall of 600 to 800 millimeters within a week. This amount of rainfall is more than 2.5 times higher than average conditions. The floods had a quick onset ('flash floods') behavior due to the catchment topography. The upstream part of the catchment where Feni, Noakhali and Cumilla are located is hilly and its altitude is much higher. The catchments are small and short, resulting in quick runoff of rainfall in downstream direction. The floods affected nearly six million people resulting in 74 fatalities, stranding 1.26 million families, and forcing over 500,000 people to take refuge in disaster shelters.

The total direct physical asset damages from the August 2024 Flash Flood are estimated at US$1.676 billion.[6] They include infrastructure, agriculture, residential, and non-residential buildings. Highest damages are observed in Noakhali, Cumilla, and Feni. Infrastructure damage includes fully damaged and partially damaged roads, damaged embankments, breached flood control embankments, damaged houses, damaged bridges and culverts, healthcare facilities. Around 3,000 education facilities were impacted, affecting 1.4 million children, including 749,390 girls in Chattogram Division alone.[7] Flooding of farmland is expected to have a lasting impact on food security. Agriculture, fisheries and livestock losses were huge and Over 85 percent of rural households depend on agriculture for their livelihoods, and with increasing reliance on groundwater and pesticides to mitigate declining agricultural outputs, food and nutritional security is at risk.[8]

The scale and magnitude of the flood damages and continuing vulnerability of the country to climate-related disasters require significant investments to rehabilitate and strengthen basic services and infrastructure. Although relief efforts have been put forward by the GoB, United Nations (UN) agencies, and Development Partners (DPs), the funding is insufficient to cover the flood impacts. The Humanitarian Coordination Task Team, co-chaired by the Secretary of the Ministry of Disaster Management and Relief (MoDMR) and the UN Resident Coordinator, updated its Multi-hazard Humanitarian Response Plan (HRP) on September 29, 2024, to include the 2024 Eastern floods. The funding requested for the August 2024 Eastern Flash Floods alone is US$71 million.

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[1] Bangladesh Shelter Cluster. October 1, 2024. *Eastern Floods Shelter Damage and Needs Assessment*.
[2] World Bank. 2024. *Floods in eastern Bangladesh, August 2024: Global Rapid Post-Disaster Damage Estimation (GRADE) Report*.
[3] Noakhali, Sylhet, Moulvibazar, Habiganj, Brahmanbaria, Cumilla, Feni, Lakshmipur, Khagracchari, Chattogram, and Cox's Bazar.
[4] UN OCHA. 2024. *Bangladesh: Cyclone and Monsoon Floods – May to August 2024*.
5 German watch. 2021. *Global Climate Risk Index 2021*.

[6] World Bank. 2024. *Floods in eastern Bangladesh, August 2024: Global Rapid Post-Disaster Damage Estimation (GRADE) Report.*
[7] Inter-cluster Coordination Group (ICCG). August 30, 2024. *Bangladesh: Eastern Flash Floods - Situation Report No. 02.*
[8] World Bank. 2016. "Bangladesh: Growing economy through advances in agriculture." *World Bank Results*.

In addition to financing gaps for immediate flood response, there is an even larger gap for medium- and long-term recovery and reconstruction. Reconstruction of damaged assets would require more than US$1.6 billion and could take years. Damaged public infrastructure, such as roads and electricity, hampers livelihoods and economic activities. Unrepaired embankments and drainages drastically reduce protection from disasters, implying that higher impacts may occur even with less severe disasters. These gaps need to be urgently addressed, in addition to supporting the affected population to get back on their feet. Research posits the importance of financial capital, assets, and networks as foundations for resilience to disasters.[9,10] Support to enhanced and diversified livelihoods, including linkages to producer networks and markets, will enable households to recover, revitalize the local economy, and contribute to building longer-term community resilience. The proposed project is multi-sectoral in order to provide holistic recovery and will support sectors that are not sufficiently covered by existing initiatives.

By following a Build Back Better approach to medium- and long-term recovery and reconstruction, the government can build institutional and technical capacity for resilient infrastructure investments. The rehabilitation of damaged infrastructure presents an opportunity to improve the quality of the infrastructure in the affected areas, as well as promote disaster resilience across the country. For example, rural roads can be upgraded to better cope with future climate extremes, while embankments and flood control structures can be rehabilitated to higher design standards.

Women and children are 14 times more likely to die or be injured during a disaster than men.[11] Vulnerabilities stem from women and girls having limited access to infrastructure that adequately meets their needs. There is an information gap arising from disaster preparedness efforts and early warning systems not being inclusive of women. This especially occurs when community mobilizers are men, who women don't feel comfortable communicating with. This discomfort hinders effective information dissemination, particularly regarding early warnings and emergency preparedness. There is a recognized need for a more gender-sensitive approach, with women likely feeling more at ease receiving information from female facilitators.

Therefore, The Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project (B-STRONG) aims to address recovery and reconstruction needs as well as strengthen disaster resilience of the country. Flooding is a recurring phenomenon that affects approximately 1 million people annually in Bangladesh, severely undermining development gains. Therefore, the proposed project will follow a Build Back Better approach[12] to reduce future flood risks. Further, the project is multi-sectoral, covering physical interventions and non-physical activities. Altogether, the project design ensures a holistic approach to recovery and resilience building, reducing future flood risks, supporting sustainable agriculture, economic development and preventing vulnerable populations from being left behind.

[9] Azad, M. & Pritchard, B.2022. "Financial capital as a shaper of households' adaptive capabilities to flood risk in northern Bangladesh." *Ecological Economics* 195.
[10] Islam R., Walkerden, G. 2014. "How bonding and bridging networks contribute to disaster resilience and recovery on the Bangladeshi coast." *International Journal of Disaster Risk Reduction* 10 (Part A).
[11] UN Women, 'WHY IS CLIMATE CHANGE A GENDER ISSUE?' (https://www.uncclearn.org/wp-content/uploads/library/unwomen704.pdf).
[12] GFDRR. n.d. *Building Back Better in Post-Disaster Recovery Guidance Note*

1.2 Project Development Objective

The project development objectives are to (a) rehabilitate and enhance the resilience of critical public infrastructure and (b) support flood-affected households to strengthen livelihoods.

1.3 Project Components

There are five components in this project and detail of these five components are depicted below.

Components	
Component 1: People Centric Resilient Infrastructure (Implemented by LGED and BWDB)	Subcomponent 1.1: Resilient Rural Infrastructure (Implemented by LGED) • construction of climate resilient multipurpose disaster shelters; • capacity enhancement and rehabilitation of existing disaster shelters by extending one floor with climate proofing connecting roads (above flood level); • improvement of damaged existing schools affected by flood to climate resilient standards; • rehabilitation of rural roads with minor enhancement of capacity to climate-resilient standards; • rehabilitation and reconstruction of existing bridges and culverts with minor capacity expansion; • slope protection on road alignment to protect against extreme precipitation and wave action exacerbated by climate change; • supply and installation of lightning protection systems to decrease vulnerability to lightning strikes resulting from extreme hydro-metrological events; • supply of search and rescue equipment for the Fire Service and Civil Defence (FSCD) for providing emergency response during extreme climate events (floods, landslides, cyclones, fires); • supply and installation of Emergency Operation Systems for upazilas. Subcomponent 1.2: Flood Protection Rehabilitation (Implemented by BWDB) • flood protection embankment re-sectioning and repair works; • canal re excavation works to increase the stormwater drainage capacity during flood; • flood control hydraulic structure reparation works; • flood protection river bank and slope protection work; • improvement of the flood forecasting system through expansion of the flood models, forecasting facilities, and technical capacity building.
Component 2 Livelihoods Recovery and Enhancement Support (Implemented by SDF)	Subcomponent 2.1: Community Empowerment and Institutional Strengthening • mobilization efforts at the community level to form community institutions, including Cluster Community Societies (CCS) and Regional Community Societies (RCS); • provision of sub-grants to the Village Development Fund (VDF) and the CCS and RCS to implement community plans, institutional development activities, and activities to improve climate-resilient livelihood facilities; • awareness-raising activities related to hygiene, nutrition, and disaster preparedness.

	Subcomponent 2.2: Enhancing Sustainable Livelihoods • provision of one-time cash transfers, sub-loans (financed from the VDF), and stipends; • skills development training on market-driven needs and financial literacy; • provision of sub-grants for the Productive Investment Fund to producer alliances to support business development, market linkages, and product promotion.
Component 3 Community Recovery and Resilience to Disasters (Implemented by DDM)	Subcomponent 3.1: Providing Livelihood Opportunities to Communities through EGPP+ • support the Employment Generation Program for the Poorest Plus (EGPP+), which is the shock-responsive window of DDM's national poverty-targeted public works program. Subcomponent 3.2: Strengthening Community Disaster Preparedness and Response • support community preparedness and response to disasters through (i) the supply of rescue boats and equipment, and (ii) training, exercises, and drills (TEDs).
Component 4 Agricultural System Restoration (Implemented by DAE and BADC)	Subcomponent 4.1: Sustainable Agricultural Production Support (Implemented by DAE) • inputs support, promote high yielding, climate resilient, water saving and sustainable crop production technologies, management methods and practices through technology demonstrations and arranging field days; • technology training to farmers to enhance performance and capacity building of farmers, and entrepreneur; • agricultural machinery support with the objectives to reduce laborious work, compensate labor shortage, enhance productivity and to promote farm mechanization; • establishment of polyshed house and seed village to supply quality seeds and seedlings; • establishment of community vermicompost and tricho-compost plants to improve soil health management; • homestead gardening to support women, community gardening targeting the vulnerable and bringing fallow land under crop production; • support for the establishment of farmer groups to disseminate sustainable agricultural crop production technologies. Subcomponent 4.2: Rebuilding Irrigation, Drainage and Storage Facilities (Implemented by BADC) • repair and reconstruction of damaged irrigation equipment, and infrastructure; • re-excavation of filled water bodies, construction of underground drainage channels, and water passes to increase surface water availability for dry season supplementary irrigation; • construction of uPVC drainage pipe line and water passes to increase drainage capacity during flood or excessive rainwater;

	• construction of uPVC pipe line for buried pipes in existing scheme to increase irrigation water use efficiency, reduce water loss and maintenance work; and • construction and renovation of damaged fertilizer and seed storage go-downs, construction of Sunning Floor, and Loading-Unloading Shades
Component 5: Project Administration, Management, Coordination, Monitoring and Evaluation	Subcomponent 5.1: Project Management, Coordination, Monitoring and Evaluation of LGED, BWDB, and DAE Subcomponent 5.2: Project Management, Monitoring and Evaluation of SDF Subcomponent 5.3: Project Management, Monitoring and Evaluation of DDM

Key Project Risks: There may be need for temporary land use (to keep construction material, set-up labor camps) also to be managed as per ESS5. The lands are all under government ownership. The project activities would require labor recruitment - the employed labor will mostly be from the flood affected local people. The risk of labor influx is minimal. Some outside labor may be required for specialized interventions in the districts. Labor associated risks include OHS issues; unscrupulous labor practices like discrimination; interaction with the flood affected people, & potential for GBV/SEA/SH. A worker GRM (responsive to SEA/SH) will be developed for workers.

Labor related risk may include Occupational Health and Safety (OHS), Community Health and Safety (CHS) and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) cases. Use of labor for construction, and cash transfer, training, job facilitation, activities may lead to SEA/SH issues. Employment under the B-STRONG Project may create potential risks associated with gender inequality, unequal access to employment, and SEA/SH. These risks can arise during recruitment, supervision, and field activities involving both project workers and community members. Female workers, contractual laborers, and local women engaged in project activities may face unequal wage opportunities, job insecurity, or unsafe working environments. Moreover, there is a risk of SEA/SH incidents perpetrated by contractors, supervisors, or project personnel, particularly where gender power imbalances exist. To prevent/address labor-induced GBV/SEA/SH issues, contractors and workers will undergo sensitization training and sign a Code of Conduct (CoC). Contractors will train workers on OHS, CoC, GBV/SEA/SH, incident reporting, and community interaction. The Project Grievance Redress Mechanism (GRM) will be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner. The GRM for project workers will be established as per the LMP (Labor Management Plan).

2. Gender Action Plan

2.1 Country Context

Bangladesh's core gender gaps persist across human endowments, economic opportunities, assets, and voice/agency. Despite historic gains in schooling, fertility decline, and maternal health, risks remain high for women and girls: nearly 29 percent of ever-partnered women reported physical or sexual violence in the last 12 months (2015), and more than half of young women were married before 18 (2019), with harmful norms curbing mobility, safety, and decision-making. Labor outcomes illustrate the ceiling: female labor force participation is about 38 percent, less than half of men, and women are concentrated in informal, lower-paid work with high exposure to harassment and unpaid care responsibilities that lower earnings over the life cycle. Large gaps persist in financial inclusion and asset control. Only about 31 percent of women hold an account versus 45 percent of men, and rural women's land ownership remains far below men's, which is reinforced by legal constraints. Leadership and voice/agency have improved but remain limited. Climate and crisis shocks widen these gaps: with feminization of agriculture and constrained access to finance, technology, and decision-making, women face higher exposure to climate risks and slower recovery. GBV and child marriage also spike during shocks, undermining human capital and economic participation.

2.2 Sectoral Context

There are gendered constraints across disaster risk management, climate, infrastructure, and service delivery. Women are less likely to receive, trust, or act on early warnings due to information channels, mobility limits, and intra-household decision dynamics. Use of public shelters and facilities is deterred by missing essentials such as privacy, safe and separate WASH/MHM, and childcare, as well as SEA/SH risks. Moreover, women tend to be less informed about available shelters and facilities. For example, in 2021, 52 percent of 3.3 million people affected by floods in 21 districts were women, however only 25,377 women (less than 2% of women affected) took shelter. The World Bank's qualitative study indicates that when asked about shelter home availability, a higher proportion of females said shelter homes were not available compared to males. Despite limited data, it is widely acknowledged that climate change and disasters increase GBV, making improved access to GBV services an urgent priority. Shelters increase GBV risks as men and women are forced into a space together under highly stressful situations. For example, in the case of Cyclone Amphan, UN Women Rapid Gender Analysis showed that 65% of respondents reported increase in GBV while only 21% respondents reported having access to GBV services. Disasters also widen gender gaps. It is more likely for girls than boys to be pulled out of school to help with domestic chores after a disaster (especially in rural areas).

The feminization of Bangladesh's agriculture sector is increasing women's dependence on natural resources for their livelihoods, increasing their vulnerability to climate change. For instance, storms and salinity intrusion (salinity has increased by 26 percent in the past 35 years in Bangladesh), disrupt agricultural jobs which are mostly held by women. Because agriculture-dependent women find it more difficult to move to urban areas and secure new jobs, they are often forced into low-paying work, continuing their cycle of vulnerability. In addition to being disproportionately impacted by climate disasters, women and girls face gender-specific barriers to adaptation, such as constrained access to finance and productive assets; limited participation in climate and disaster risk management decision-

making; lower access to climate-resilient technologies and information (including tailored, timely early warnings); and social norms that restrict mobility and the uptake of adaptive practices.

The Government of Bangladesh has been improving the design of shelters incorporating gender-sensitive features, such as the ones under the Bank-supported Multipurpose Disaster Shelter Project under implementation, to address such gaps and needs. Further, engaging women in preparing disaster preparedness plans is critical to ensure that their differentiated needs and concerns are considered. Engaging women in preparing disaster preparedness plans is critical to ensure that their differentiated needs and concerns are considered. A study showed that 65% of women respondents were not consulted by service providers and only 13% of respondents noted that women-led NGOs were involved in disaster response. Examining usage of cyclone shelters, studies show that women do not seek refuge in cyclone shelters due to lack of separate toilets and spaces for women – 35% of the non-evacuee respondents cited these two reasons for not using shelters. Many shelters also do not provide spaces for women to conduct their livelihood activities.

Women and girls have limited access to climate and disaster-related infrastructure that fulfills their differential needs and provides security, and there are gendered constraints across disaster risk management, climate, infrastructure, and service delivery that compound these gaps (for example, women are less likely to receive, trust, or act on early warnings due to information channels, mobility limits, and intra-household decision dynamics) For example, in 2021, 52 percent of 3.3 million people affected by floods in 21 districts were women, however only 25,377 women (less than 2% of women affected) took shelter , reflecting that use of public shelters and facilities is deterred by missing essentials such as privacy, safe and separate WASH/MHM, and childcare, as well as SEA/SH risks as informal infrastructure was not equipped to offer protection to women and girls for prolonged periods of time. In the absence of national data, district data from 2020 floods show that fewer women use shelters compared to men. Shelters increase GBV risks as men and women are forced into a space together under highly stressful situations. Differential needs for women, such as separate toilet facilities with WASH facilities, menstrual hygiene management facilities, childcare facilities and private spaces for pregnant or breast-feeding women, and GBV services are often lacking in disaster shelters despite evidence that climate change and disasters increase GBV, making such services an urgent priority.

For example, during Cyclone Amphan, UN Women's Rapid Gender Analysis revealed that 65% of respondents reported an increase in gender-based violence (GBV), while only 21% reported having access to GBV services. Consequently, many women and girls refrained from taking refuge in shelters due to concerns about personal security. Studies examining the use of cyclone shelters show that women often avoid these facilities because of inadequate separate toilets and the absence of designated spaces for women and 35% of non-evacuee respondents cited these reasons for not using shelters. Moreover, many shelters lack dedicated areas for women to carry out livelihood activities. Disasters also tend to widen gender gaps, as girls are more likely than boys to be withdrawn from school to assist with household chores, particularly in rural areas.

Moreover, women tend to be less informed about available shelters and facilities and are less likely to receive timely, tailored early warning information. The World Bank's qualitative study indicates that when asked about shelter home availability, higher proportion of females said shelter homes were not available compared to males. These information gaps, combined with mobility constraints and intra-household decision-making dynamics, reduce women's ability to act on warnings and access services when disasters strike. The Government of Bangladesh has been improving the design of shelters incorporating gender-

sensitive features, such as the ones under the Bank-supported Multipurpose Disaster Shelter Project under implementation, to address such gaps and needs. Further, engaging women in preparing disaster preparedness plans is critical to ensure that their differentiated needs and concerns are considered. Engaging women in preparing disaster preparedness plans is critical to ensure that their differentiated needs and concerns are considered. A study showed that 65% of women respondents were not consulted by service providers and only 13% of respondents noted that women-led NGOs were involved in disaster response.

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

The successful implementation of the project activities calls for a robust Gender Action Plan that integrates gender-responsive early warning dissemination; ensures privacy, safe and separate WASH/MHM, childcare, and livelihood spaces in shelters; strengthens SEA/SH risk mitigation and access to GBV services; and systematically improves sex-, age-, and disability-disaggregated data to inform design and monitoring

2.3 Gender Action Plan Summary

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

The Gender Action Plan also ensures compliance with the World Bank's support of the Sustainable Development Goals and World Bank Group Gender Strategy 2024-2030. It aims to move the Bank's development work beyond gender mainstreaming to reducing gender gaps in the disaster and climate change sector. The proposed Gender Action Plan will be further revised by the gender specialist in the PIU before the start of implementation.

The overall objective of the Gender Action Plan is to identify entry points to increase women's knowledge and increase their disaster preparedness and recovery. The project addresses significant gender gaps in disaster-affected communities, with a strong focus on women's empowerment through enhanced livelihood and entrepreneurship outcomes. The project will a) ensure 90 percent female representation in community institutions, with the positions of president, secretary, and cashier reserved for women, b) provide training and capacity building to women to foster their leadership and decision making, c) support skills development for improved economic opportunities, d) provide loans to support income generation activities, e) strengthen market linkages and business promotion support, f) provide opportunities for homestead gardening to support women. The project will make efforts to involve women who have not engaged in income-generating activities and support women in short-term employment in public works and community service.

Table 2.1: Gender Action Plan

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
Gender Assessment	Rapid gender assessment that translates findings into the gender action plan and the SEA/SH action plan which: (a) diagnose key gender gaps and differential disaster impacts relevant to the project's two objectives—resilient public infrastructure and flood-affected households' livelihoods and recovery—as well as their implications for disaster preparedness and response; (b) review the policy and institutional framework for gender inclusion and disaster risk management; (c) identify specific activities to address these gaps and ensure the integration of women's needs and priorities into disaster preparedness, response, and recovery efforts; (d) conduct safe and inclusive stakeholder consultations, particularly with women's groups, to prioritize actions; and (e) analyze GBV/SEA/SH risks specific to the project's sectors and implementation modalities, including risks arising during emergency response and shelter management, and identify strategies to mitigate those risks through prevention, awareness, and survivor-centered response mechanisms.	PIUs, gender and GBV specialists and Monitoring and Evaluation Firm	Before start of implementation of the project	2000
Component 1: People Centric Resilient Infrastructure				**7000**
Consultation with relevant Stakeholders for Gender Friendly Shelter Construction	Consultation with women, adolescent girls, NGOs/CSOs and other vulnerable groups on multipurpose shelter design (e.g., women-friendly spaces, separate toilets, menstrual health and hygiene support, breast feeding room with privacy, kitchen facility, and washing facilities, children safe zone), disability (e.g., ramps for entrance), and other vulnerabilities. Conduct separate,	PIU, gender and GBV specialists	Before the shelter design	

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
	safe consultations with women, adolescent girls, older persons, and persons with disabilities, facilitated by female staff, and document how inputs inform design.			
Shelter Design Sharing	Share the design with women and the community and incorporate their opinions in the design. Validate not only the layout but also the proposed location and access routes, record feedback and design changes. Use accessible formats and hold sessions at times convenient for caregivers.	PIU, gender GBV specialists and site engineers	Before finalization of shelter design	
Safety and Accessibility Audit	Safety and Accessibility Audit before finalization of shelter site and design to know about any possible GBV risk in the area or in connecting road. Ensure safe access to and from shelters by improving lighting and wayfinding on connecting routes identified in the safety audit. Include participatory "safety walks" with women and girls, including at dusk/night.	PIU, gender, GBV specialists and site engineers	Before finalization of shelter place and design	
Women Inclusion in Shelter designing	Include strong representation of women (ideally close to 50%), including adolescent girls' caregivers and persons with disabilities, in maintenance committee shelter for regular operations and maintenance of the shelters along with associated facilities.	PIU, gender and GBV specialists	After the shelter construction	
Consultation and Validation	Consultation and validation with women and community before handover of the shelter to ensure women and other vulnerable groups' needs are addressed. Conduct a post-occupancy review 1–3 months after first use to capture real-use issues and adjust SOPs/design.	PIU, gender and GBV specialists	Before handed over the shelter to community	
Gender-Friendly Safety Measures	Ensure adequate, reliable, maintained lighting and signage on roads, facilities, toilets with proper light and lock and shelters	PIU, gender and GBV specialists	During implementation	

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
Community Engagement to Increase Flood Resilience and Improve Livability	Include women and vulnerable populations in decision-making process of on technical design features of climate-resilient infrastructure, and disaster and emergency response services e.g., road, bridge, embankment, riverbank protection works etc. Use segmented consultations (women, adolescent girls, older persons, persons with disabilities, caregivers) with female facilitators and accessible formats; hold at convenient times/locations and provide childcare and transport stipends as needed.	PIU, gender and GBV specialists	Before the community infrastructure design	
Gender-Sensitive Disaster Preparedness and Response in Early Warning Systems (EWS)	Consult with women, children, persons with disabilities, elderly, and other marginalized and vulnerable groups to include their priorities in contingency plans. Use participatory methods as noted above on community engagement, such as at times and locations safe and accessible to targeted groups and ensuring reasonable accommodations (sign language interpretation, accessible venues, childcare, travel stipends) to enable meaningful participation. Document disaggregated findings and integrate them into plan revisions with clear responsibilities.	PIU, gender and GBV specialists	Before Developing the Disaster plans	
Gender and Social Inclusion Audit of EWS	Conduct a gender and social inclusion audit of the EWS to identify gaps related to education/literacy, language, access to information, digital divide, access to resources; then update the EWS to make it gender-responsive and inclusive. Review all EWS channels (sirens, radio, SMS/IVR, social media, community volunteers, places of worship/markets) to ensure redundancy and reach for people without phones or literacy	PIU	Before the EWS review	

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
Typologies Define with Guidance in EWS	Define alert typologies with actionable, role-specific guidance for women and men (e.g., evacuation support for caregivers, safe shelter access, cash/asset protection). Adopt multiple languages, plain-language and pictogram messages, and audio formats; pretest messages with women, adolescent girls, and persons with disabilities.			
Ensuring Safe Evacuation during EWS	Ensure shelters and evacuation routes are safe and accessible (lighting, separate WASH facilities, privacy, dignity kits, ramps), and link EWS to GBV risk mitigation and referral pathways.			
Increase Recruitment for Women	Increase recruitment, retention, and advancement of women in the CPP volunteer pool. with targets for women's participation and leadership. Address barriers through flexible schedules, safe transport, childcare support, and stipends; provide leadership, first aid, search-and-rescue, and incident command training for women. Adopt zero-tolerance policies for harassment; establish confidential reporting and survivor-centered response; ensure PPE and equipment sized appropriately for women. Pair new women volunteers with mentors; recognize and compensate roles equitably.	PIU	During recruitment	
Implement Risk Communication Program	Implement risk communication and community engagement programs such as community sessions, household outreach, school-based activities, drills and simulations, participatory theatre or street drama, designed to reach women and girls. Schedule sessions at times convenient for women and caregivers; provide childcare and	PIU	Throughout the project	

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
	transport; deliver content via trusted female facilitators and local women's groups. Include practical components: how to interpret alerts, decide and execute evacuation plans, prepare go-bags, access safe shelters, and protect documents and assets. Integrate GBV risk mitigation, safeguarding, and referral information; promote men and boys' engagement to support equitable household decision-making			
	Engage women's organizations, youth groups, and local leaders through MOUs to co-design and co-deliver activities.			
Component 2: Livelihoods Recovery and Enhancement Support				**1000**
Restore and enhance livelihoods of flood-affected households through community-driven development	Form, strengthen, and mobilize community institutions (Village Development Fund, Cluster Community Societies, Regional Community Societies) with strong women's leadership and inclusion ensuring 90% female representation and the positions of president, secretary, and cashier reserved for women	PIU, gender and GBV specialists	Early stage of project implementation	
Strengthen capacity of women leaders and members to manage community institutions	Provide leadership, management, and governance training to women in president, secretary, and cashier roles, as well as for a pipeline of female deputies	PIU, gender, GBV specialists training providers	Early stage and periodically throughout project	
Improve income-generating opportunities for vulnerable and flood-affected women groups	Provide one-time cash transfers, sub-loans for IGAs, and stipends for students via formal banking channels (preferably to women's accounts, including through KYC facilitation), bundled with business planning support, market linkage advisory, and financial/digital literacy. Priority will be given to flood-affected and vulnerable women (including female-headed households, women with	PIU, gender and GBV specialists	Throughout project implementation	

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
	disabilities, adolescent mothers/students, and high care-burden households), with beneficiaries identified through a community participatory process as set out in the Community Operations Manual, validated through community meetings and the project GRM. Support will be provided to facilitate account opening, SIM registration, and agent banking access; ensure no-fee withdrawals for program payments.			
Strengthen producer alliances for sustainable market linkages for women	Provide sub-grants to women-led producer groups and MSMEs through the Productive Investment Fund for business development, standards compliance, market linkages, and product promotion	PIU, gender and GBV specialists	During project implementation	
Component 3: Community Recovery and Resilience to Disasters				**3000**
Provide temporary employment and income support to flood-affected poor households through EGPP+	Identify and enroll eligible beneficiaries in target districts through a community participatory process consistent with the EGPP+ Implementation Guidelines for women; verify eligibility and enrollment in the program MIS; validate lists in community meetings; route payments via formal financial services—preferably to women's own accounts; and handle complaints and appeals via the project GRM	PIU, gender and GBV specialists	Start of implementation	
	Recruit women and older adolescent girls as community volunteer to support EGPP+ community services and build their capacity as skilled facilitators through a structured training package (e.g., facilitation, GBV/SEA-SH referral pathways, financial literacy, basic disaster risk management), with age-appropriate roles, safe working conditions, and clear terms of engagement	PIU, gender and GBV specialists	During the project implementation	
Component 4: Livelihoods Recovery and Enhancement Support				**1500**

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
Increase women's participation in climate-resilient and sustainable agricultural production	Target and register women farmers (including widows, female-headed households, and women from vulnerable groups) for input support and climate-smart technology demonstrations. Ensure sex-disaggregated tracking	PIU, gender and GBV specialists	Early stage of implementation	
	Conduct women-focused training and on-plot demonstrations on high-yielding, climate-resilient, and water-saving practices, ensuring training times and locations are accessible for women; where feasible, facilitate childcare/transport and pair group trainings with field-level hands-on support and simple advisories.	PIU, gender, GBV specialists and NGOs	Throughout project period	
	Promote homestead and community gardening projects led by women, targeting nutrition security and income diversification	PIU, local women's groups, NGOs	Throughout project	
Improve women's access to climate-resilient irrigation, drainage, and storage facilities	Ensure meaningful participation and consultation of women farmers in planning irrigation and drainage rehabilitation to reflect their agricultural needs, using separate consultations where appropriate and documenting how women's priorities are reflected	PIU, gender specialists, community representatives	Before infrastructure works begin	
	Design and retrofit infrastructure works to be safe and accessible for women, including adequate lighting, safe paths, proximity to fields/homesteads, secure storage management processes, and clearly assigned time slots for use. Integrate gender-responsive OHS and contractor SEA/SH risk mitigation requirements in bidding documents and supervision.	PIU, contractors, gender specialists	During construction/rehabilitation phase	
Component 5: Project Administration, Management, Coordination, Monitoring and Evaluation				1000
Community operations and maintenance (O&M)	Include women and other vulnerable community group in capacity building training for O&M	PIU, gender and GBV specialists	During project implementation	

Objective	Actions	Responsibility	Timeline	Indicative Budget (US$)
Established Feedback Mechanism for Women and Vulnerable Populations	Establish an inclusive Feedback mechanism that will ensure women and other vulnerable groups' perspectives and needs are incorporated throughout the construction process so the women can take an active role in the oversight and monitoring of the infrastructure work	PIU, gender and GBV specialists	During the construction	
Project monitoring	PIU officials will be trained on Gender, GBV/SEA/SH in emergency, gender responsive planning and monitoring	PIU, gender and GBV specialists	Before the project implementation and it will continue during implementation	

3. SEA/SH Risk Mitigation Plan

Project Name	Bangladesh Sustainable Recovery, Emergency Preparedness and Response Project
Risk Rating	Substantial

3.1 SEA/SH Project Risks

Bangladesh is among the countries with the highest levels of gender-based violence (GBV) in South Asia. Flood-affected districts of Bangladesh—such as Noakhali, Sylhet, Moulvibazar, Habiganj, Brahmanbaria, Cumilla, Feni, Lakshmipur, Chattogram, and Cox's Bazar—face heightened risks of gender-based violence (GBV), intimate partner violence (IPV), sexual assault, and child marriage, particularly during and after disasters. 74% of women in disaster-prone areas have experienced IPV in their lifetime[13], compared to 68% nationally, with young married women (15–19) most at risk.[14] Flood shelters in Sylhet often lack privacy and gender-sensitive facilities, increasing exposure to GBV, while in coastal districts such as Noakhali and Feni, pre-existing high rates of child marriage (42.9% and 38.7% respectively) and IPV (over 42%) have been exacerbated by disaster impacts.[15] The International Rescue Committee reported a 39% surge in child marriage following climate-induced disasters, driven by economic hardship, school closures, and loss of livelihoods.[16] These overlapping vulnerabilities highlight the urgent need for targeted GBV prevention and protection measures in Bangladesh's flood-affected regions.

SEA/SH risk mitigation measures refer to the actions to reduce the risk that people will be exposed to/experience SEA/SH by addressing the factors where project actors or beneficiaries (and the project) may create or heighten that risk.

[13] Share-Net Bangladesh. 2022. *Rapid Gender Analysis of Flood Situation in North and North-Eastern Bangladesh*.
[14] United Nations Population Fund (UNFPA). 2024. *Violence Against Women Survey: Intimate Partner Violence remains widespread in Bangladesh*
[15] Daily Observer BD. 2024. *Call for Gender-Inclusive Flood Responses and Recovery*
[16] Prevention Web. (2022). *One less mouth to feed: Climate disasters linked to child marriage in Bangladesh*.

The SEA/SH risk rating at concept stage is 'Substantial,' this is especially due to the context of the project, peri-urban location, mix of local and outside labor influx and the project location being close to schools or areas where women and young girls have increased mobility. Although labor influx is low, given the project's location setting, the risk is higher. The project will continue to assess these risks further and develop mitigation measures during project implementation. For this level of SEA/SH risk, both a GBV and Gender specialist within the IA will be assigned, a robust SEA/SH responsive GRM will be established through which cases will be referred to mapped GBV service providers, a code of conduct will be developed and signed by workers and an SEA/SH Action Plan will be developed and implemented. Identification or mapping of holistic quality GBV service providers, recruiting a GBV specialist in the PIU, develop an accountability and response framework for the project, behavioral standards, disciplinary measures, recruitment of staff engaging closely with children, provide safe spaces/opportunities in facilities for people to raise concerns around their safety, conduct background checks/vet staff during recruitment is crucial to mitigate SEA/SH risks.

Local institutional environment for safety of women and girls

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

NGOs are working for GBV response like legal support, psychosocial support, mediation, social integration, shelter, livelihood, health etc. Sometime Local government representatives do Shalish (Mediation) for GBV cases which is used for most GBV cases in rural areas. Religious leaders/ elite people in rural area also involve in the process. These are very common practice in Bangladesh. Survivors and their family take this support mostly to avoid the legal process because of its complexity.

PIU's capacity to prevent and respond to GBV risks

LGED, BWDB, SDF, DAE-BADC and DDM all the agencies are very familiar with Bank safeguard policies as well ESF and have a satisfactory track record of implementing ES management activities in Bank-financed projects. The IAs have received intensive trainings on labor management, occupational health and safety, community health and safety, waste management, multi-stakeholder.

Table 3.1: SEA/SH Risk Mitigation Plan

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
1.	**GBV Expert installed**	• GBV Expert in PIU and Supervision Consultant team	Preparation and Implementation	PIU	• GBV Expert is installed	• Ongoing communication with GBV Expert and PIU	
2.	**Sensitization of IA** addressing GBV/SEA/SH risk on project and the mechanism of implementation	• Consultation with PIU • Training/orientation session carried out to sensitize PIU on importance of addressing GBV/SEA/SH risks including child SEA/SH risk and investigation of GBV cases, requirements for dealing with child SEA/SH cases and documentation focusing on survivor centric approach	Preparation and implementation	Task Team	• PIU and project staff sensitized on the GBV/SEA/SH risk factors in the project areas and trained on how to prevent and respond to GBV/SEA/SH	• Task team to monitor and provide additional guidance as necessary	
3.	GBV risks adequately reflected in all safeguard's instruments (i.e., Project ESMP, CESMP)—particularly as part of the assessment in the ESA and integrated in ESF	• Consider GBV risk in all safeguards documents • Include GBV risk issues in consultation agenda • Incorporate feedback in project design	• Preparation Implementation (before civil works commence) • In line with SEP hold Consultations need to be	• PIU for social assessment and ESMP • Contractor for CESMP	• GBV is included in all safeguard's documents • Feedback from community is address in project design and activity	• Ongoing review during implementation support missions. • Update project ESMP and Contractor's ESMP (CESMP)	

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
	activities. Include the GBV mapping in these instruments. Update as needed during implementation		continuous throughout the project cycle, not just during preparation			if risk situation changes. • Monitoring of implementation of Stakeholder Engagement Plan • Ongoing consultations, particularly when CESMP is updated	
4.	**Robust GBV/SEA/SH Action Plan** including the Accountability and Response Framework as part of the ESMP	• Finalize the draft GBV/SEA/SH Action Plan • Contractor/consultant's inputs and response to these requirements will be required to be reflected in their CESMP • Integrate SEA/SH risk including child SEA/SH mitigation across all livelihood activities and public-facing events; map services and train focal points; include codes of conduct in all partner and contractor agreements.	Before civil works commences	IA (Social Specialist with GBV/Gender Expert or Gender consultant)	GBV action plan developed	• Ongoing review during implementation support missions. • Update project ESMP if risk situation changes	

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
		• Integrate a shelter-specific SEA/SH package: worker and volunteer Codes of Conduct; mandatory training; on-site awareness materials; and a contractor GBV focal point.					
5.	**Establish and strengthen an effective GRM** that can respond to GBV/SEA/SH cases based on the existing framework	• Map GBV service providers or response actors including child protection organization in project areas building on the starting list shared by World Bank available for flood affected districts • PIU to disseminate the information • Conduct a deeper quality assessment of service providers such as success rate, response of SP, time taken to resolve • Train personnel to operate GRM i.e., proper documentation for complaint registration and	Prior to contractor mobilizing	IA, GBV Expert	• Identified organizations working in the project area. • The mapping incorporates the quality assessment of the service providers. • Referral pathway established • Directory of organizations	• Ongoing monitoring and reporting on GRM to verify it is working as intended	

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
		management; investigation and confidential reporting with safe and ethical documenting of SEA/SH cases considering survivor centric approach • Ensure the GRM is child sensitive GRM at school • Inform community and Primary schools about GBV and child sensitive GRM • Provide appropriate referral to survivors • Develop Accountability and Response Framework and a referral process flowchart to respond to cases					
6.	**Codes of Conduct** signed and understood	• Develop the CoC which includes Child SEA/SH for two groups of project actors -- laborers and community facilitators and volunteers including sub-contractors Ensure requirements in CoCs	Initiated prior to contractor mobilization and continued during implementation	Contractor, Consultant, IA	• Number of project-related staff and workers trained and oriented on CoC • Number of people who signed CoCs	• Review of GBV risks during project supervision (e.g., Mid-term Review) to assess any changes in risk • Supervision consultant	

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
		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				reporting that CoCs are signed and that workers have been trained and understand their obligations.[17] • Monitoring of GRM for GBV complaints • Discussion at public consultations	
7.	**Community awareness raising and trainings** for all actors involved in the project on GBV/SEA/SH and child SEA/SH	• Training for Project workers/actors (laborers, community facilitators/volunteer) • Training/awareness building for local community, Primary school's SMC members on GBV/SEA/SH and reporting • Incorporate male-engagement modules and community dialogues	Implementation	IA, GBV Expert, Contractors, Consultants	• Number of project worker trained • Number of Community people trained	• Ongoing reporting	

[17] 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.

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
8	**Creating Safe Spaces at the Facility-level** to raise concerns about safety issues	• Conduct a facility-level safety audit and mapping (schools, community shelters) to identify areas with potential SEA/SH risks (e.g., poorly lit areas, lack of privacy, unsafe access routes). • Ensure separate, safe, and lockable facilities (toilets, bathing, sleeping areas) for men and women in all project-supported sites, including temporary shelters and worker camps. • Install adequate lighting in public and communal areas (e.g., toilets, walkways, parking lots, waiting areas) to ensure women and girls' safety and accessibility. • Display SEA/SH prohibition and reporting information at all project sites, using visible and context-appropriate	Design and construction phase	IA, Contractor, Design Engineer,	• Number of safety audits completed; risk maps developed and validated • Percentage of facilities meeting gender-segregated safety standards • Number of facilities with functional lighting in key areas • Number of sites displaying SEA/SH messages and GRM contacts	• Annual review and update of safety maps based on site visits and feedback • Continuous monitoring through ESMP and supervision reports • Continuous community awareness and signage updates	

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
		signage and IEC materials in local languages.					
9.	**<u>Procurement:</u>** Clearly define the GBV/SEA/SH and Child SEA/SH requirements and expectations in the bid documents and evaluate contractor's capacity who are working especially in schools**.** 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.	• Formulate and adopt SEA/SH informed bidding document • Inform the contractors and provide orientation • Evaluate contractor's ability to meet project's SEA/SH prevention and response requirement prior to finalize the contract • Evaluate contractor's and sub contractor's CoC • Develop community and school child protection mechanism to mitigate child SEA/SH involving parents and school teachers	Procurement	IA	• SEA/SH requirement and expectation are adapted in bid document	• *Review by Task Team*	
10.	**Review CESMP** to verify that appropriate mitigation actions are included	• Review CESMP • Address gap if any	Implementation	PIU	• CESMO included GBV mitigation measures	• *Reviewed by Task Team*	

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
11.	Implement appropriate project-level activities to **reduce SEA/SH risks in construction site** prior to civil works commencing	• 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 SEA/SH is prohibited • In school a disaplay sign on Child SEA/SH risk and do's and don'ts during communicating children at school time for labour and project staff • Encourage contractor to avoid construction work during school timimg	Prior to works commencing	Contractor/ Supervision Consultant Task Team	• Documentation of measures taken to reduce GBV risks	• Ongoing reporting • Reviews during implementation support missions	

S/N	Objectives	Activities	Timing for Action	Responsible	Indicator	Ongoing Risk Management	Budget
		• As appropriate, public spaces around the project grounds should be well-lit					
12.	**M&E** **Review GRM processes** to ensure it receives and processes complaints to ensure that the protocols are being followed in a timely manner, referring complaints to an established mechanism to review and address GBV complaints.	• Review the GRM mechanism • Addressing gap if any	Implementation	Task Team, IA, GBV Expert	GRM mechanism reviewed and addressed the gap	• Ongoing reporting • Monitoring of complaints and their resolution	
13.	**M&E and reporting** of GBV/SEA/SH action plan	• Undertake regular M&E of progress on GBV/SEA/SH activities, including reassessment of risks as appropriate • Conduct M&E field visits. • Review quarterly the action plan and progress against indicators listed • Provide quarterly report	Implementation	IA, GBV Expert, Contractors, Consultants.	• Successful implementation of SEA/SH Action Plan (Y/N) • Quarterly report	• Monitoring of GRM • Ongoing reporting.	

Annex 1: Sample Labor Code of Conduct covering the GBV/SEA/SHA related risks

Introduction

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

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

Definitions

Sexual Exploitation and Abuse (SEA)[18]

Is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another[19].

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

Sexual Harassment:[20]

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

Sexual Harassment versus SEA[21]

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

Consent is the choice behind a person's voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent. **Under this Code of Conduct**[22] **consent cannot be given by anyone under the age of 18**, **regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense**.

There is no consent when agreement is obtained through:

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

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

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

[21] Ibid

[22] In accordance with the United Nations Convention on the Rights of the Child.

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

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

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

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

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

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

Individual signed commitment:

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

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.

- **Not** participate in SEA and SH as defined by this *Code of Conduct* and as defined under *(country)* law (*and other local law, where applicable).*
- **Not** use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- **Not** participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- **Not** solicit**/**engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered "non-consensual" under this Code.

I commit to:

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

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

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

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

I understand that it is my responsibility to adhere to this code of conduct. That I will avoid actions or behaviors that could be construed as SEA and SH. Any such actions will be a breach this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SH issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

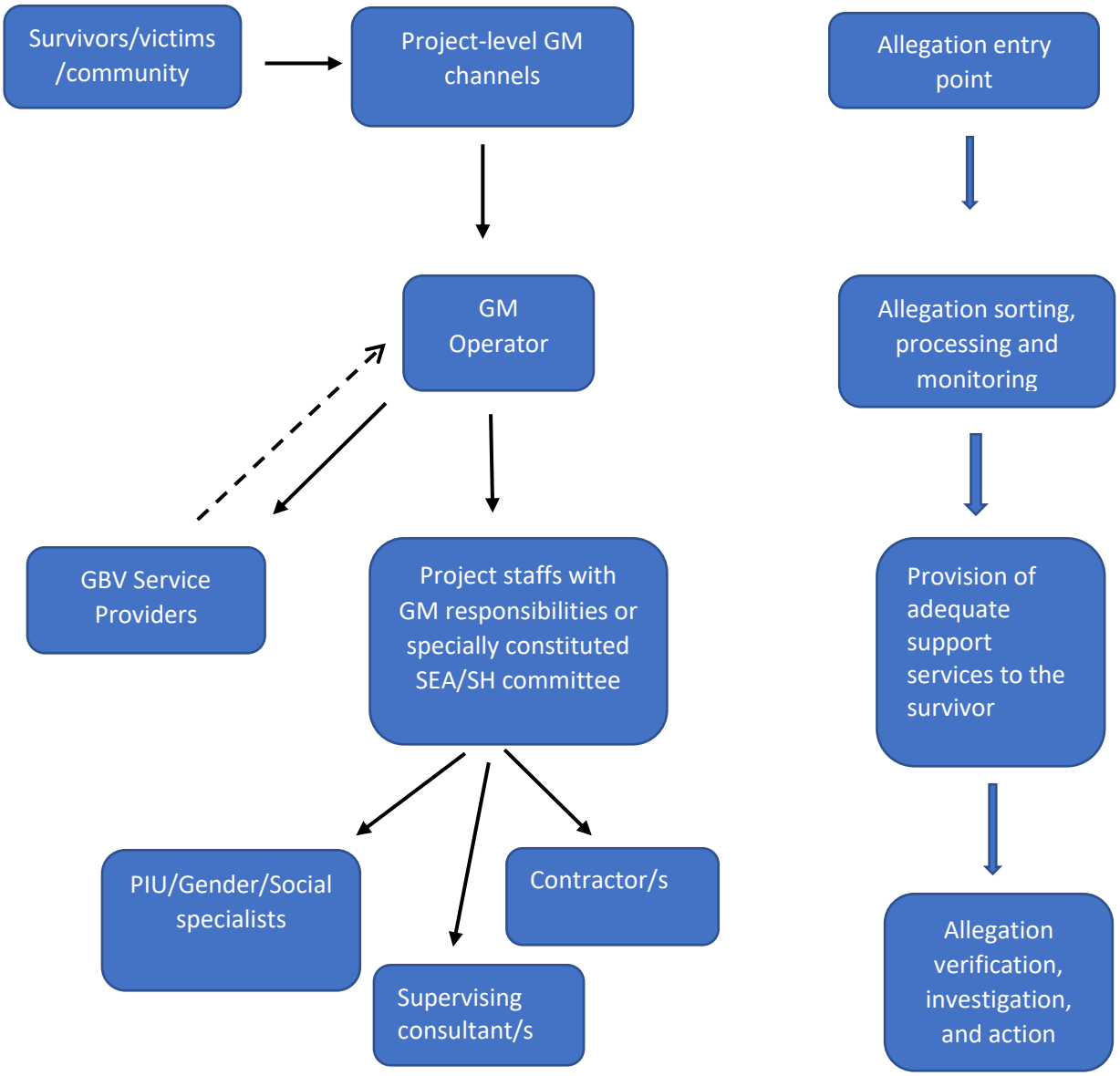
Signature: _____

Printed Name: _____

Title: _____

Date: _____

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



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