

Document Name
Gender Based Violence Action Plan

**ETHIOPIA-SOMALILAND
NORTHERN HIGH VOLTAGE
INTERCONNECTOR:
ETHIOPIA
SEXUAL EXPLOITATION AND
ABUSE/SEXUAL
HARRASSMENT ACTION PLAN
FOR 73.1KM JIGJIGA TOGO
WAJAALE HIGH VOLTAGE
TRANSMISSION LINE.**

**ETHIOPIA-SOMALILAND
NORTHERN INTERCONNECTOR:**

**ETHIOPIA
SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARASSMENT ACTION
PLAN**

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ACRONYMS

AIDS	Acquired Immune Deficiency Syndrome
CEDAW	Convention on Elimination of All Forms of Discrimination against Women
CSA	Central Statistics Agency
EEP	Ethiopian Electric Power
ESIA	Environmental Social Impact Assessment
FGD	Focus Group Discussion
GAP	Gender Action Plan
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
HIV	Human Immunodeficiency Virus
HTP	Harmful Traditional Practices
HV	High Voltage
ICCPR	International Covenant on Civil and Political Rights
KII	Key Informant Interview
M&E	Monitoring and Evaluation
MCH	Maternal Child Health
NEWA	Network of Ethiopian Women Association
PAPs	Project Affected Persons
PASDEP	Plan of Action for Sustainable Development and Eradication of Poverty
PIDA	Program Infrastructure Development for Africa
RPSMP	Regional Power System Master Plan (2014)
SA	Sexual Abuse
SEA	Sexual Exploitation Abuse
SH	Sexual Harassment
UN	United Nations
WB	World Bank

DEFINITION OF KEY CONCEPTS

Gender-Based Violence 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 between males and females. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm.

World Bank defines **Sexual Exploitation and Abuse (SEA)** as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. The abuse of such power may include wrongful gains such as profiting monetarily, socially or politically from the sexual exploitation of the weak in society. In the projects financed by the WB sexual exploitation occurs when access to or benefit from Bank financed goods, works, non-consulting services or consulting services is used to extract sexual gain.

Sexual Abuse (SA) is defined by the WB as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment (SH) is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. It occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

I PROJECT DESCRIPTION

I.1 Introduction

The proposed 330km high voltage transmission line traverses Oromiya, Afar, Somali and Amhara Regional States starting at a proposed substation from Bishoftu in Debre Zeit (8o44'51" N, 38o55'29" E) and terminating at Hurso sub station (9o36'46" N, 41o38'20" E). It is expected that upon completion, the 400kV double circuit transmission line will be part of the Ethiopia-Somaliland interconnector. The proposed Right of Way (RoW) for the transmission line will be a 40m wide corridor with a total length of 330km running suggesting that approximately 132Ha of land may be acquired and/or expropriated for project purposes.

The project is owned by Ethiopian Electric Power (EEP) and designed to facilitate power trade between Ethiopia and Somaliland, making sure that Somaliland will get access to cheaper and green power from Ethiopia.

I.2 Project Development Objective

The Horn of Africa Regional Integration for Sustainable Energy Supply (P174175) is a World Bank financed project whose objective is to enhance regional integration of energy supply and to improve energy access in the borderlands in Horn of Africa countries.

I.3 Project Component

The project is composed of the following components.

Component 1-Physical Interconnection Infrastructure

The component will provide support to some or all of the following activities, depending on investment readiness and political buy-in from the client countries:

- The construction of 400 kV transmission lines between Ethiopia and Somalia (Northern and Southern),
- The reinforcement of the existing Ethiopia-Sudan 230 kV double circuit transmission line, and
- The construction of the second Ethiopia-Sudan 500 kV transmission line.

Component 2-Energy Access Interventions in Borderland Areas

This component targets energy access interventions in borderland areas, mostly agri-pastoralist population in Ethiopia and Somalia. It includes the following activities:

- Electricity access to public institutions (for example, health facilities, schools, veterinary posts, community centers, street lighting, telecom towers),
- Electricity access to households,
- Electricity access for productive uses (for example, water points-which are mostly privately owned-refrigeration and cold chains, agri-processing, and so on), and
- Access to clean cooking for households and social centers in borderland communities of the HoA.

Women are expected to benefit disproportionately from the interventions as they have lesser mobility whereas men tend to travel seasonally for livestock trading and are already engaged in cross-border trading activities. This component will also support a benefit-sharing program for the affected communities by Component 1. This component will prioritize the most vulnerable and underserved communities or development nodes where there is lack of energy access, concentrated presence of public institutions and water points along trading routes

(places of gathering for surrounding communities, including nomadic population) and markets, and existing cross-border trade.

Component 3-Technical Assistance and capacity building for regional power integration.

This component will provide technical assistance and capacity building to the EAPP, its member countries, and the regional IRB. This component will be informed by the Regional Power System Master Plan (2014) (RPSMP) of the EAPP and the African Union Program Infrastructure Development for Africa (PIDA) 2020 Priority Action Plan. In addition, proposed activities will be informed by the EAPP 10-year Strategic Plan (2018–2027) and the Short-term Action Plan (2021–2023).

1.4 Project Activities

The Project schedule includes the following phases:

- **Pre-Construction Phase (Phase 1):** includes detailed design, acquisition of land for the ROW and ancillary infrastructures (e.g. substation, construction of workers' accommodation, identification of material sites) etc.
- **Construction, pre-commissioning, and commissioning phase (Phase 2):** includes civil works, construction of buildings and installation of site facilities, as well as mechanical and electrical works. The construction activities are planned to take approximately 18-24 months including pre-commissioning and commissioning phases. Currently it is foreseen that the main construction activities will start in the third quarter of 2025 and will be concluded in mid-2027.
- **Operations and maintenance phase (Phase 3):** the operation will commence and involve periodic maintenance activities at the Project site facilities and ancillary infrastructure. The design life of the line is of 50 years.
- **Decommissioning phase (Phase 4):** At the end of the planned operational lifetime, the operation of the Project facilities and ancillary infrastructure will be reviewed and either extended or decommissioned. Decommissioning will involve the removal and reuse/recycling/disposal of surface structures and the reinstatement and restoration of the affected sites.

1.5 Potential Project Related SEA/SH/Risks

The project anticipates an influx of in-migrants which might lead to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) in the workplace. Although a large influx of workers is not expected, the in-migration may increase the demand for sex work or the risk of forced early marriage in the project area where the local community believes that marriage to an employed man is perceived as the best livelihood option for an adolescent girl. In addition, higher wages among workers 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. The Project may create changes in the project affected communities and can cause shifts in power dynamics between the community members and within households. Male jealousy, a key driver of SEA/SH, can be triggered by labor influx on a project area when workers are believed to be interacting with the local 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. Potential resettlement for civil works may equally render women vulnerable to SEA/SH. Projects with a large influx of workers may increase the demand for sex work in some instances increasing 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 option 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 sexual activity between laborers and minors, even when it is not transactional, can also increase.

1.6 SEAH Purpose and Objectives

The objective and purpose of developing a Sexual Exploitation and Abuse Action Plan is to develop operational measures that will be put in place to assess and mitigate the risks of gender-based violence, including sexual exploitation and abuse (SEA) and sexual harassment that are project related and how they will be integrated over the life of the project. The Sexual Exploitation and Abuse Action Plan is designed to ensure the project;

- Lowers gender inequality;
- Addresses the needs and constraints of women, girls, men, and boys;
- Avoids potential adverse gender impacts/risks;
- Ensures women’s participation in the project;

This SEAH Action Plan details the operational measures that will be put in place to assess and mitigate the risks of sexual exploitation and abuse (SEA) and sexual harassment that are project related and how they will be integrated over the life of the project. This includes procedures for preventing and responding to SEA/SH including managing these grievances.

1.7 Approach and Methodology

This section describes the approach and methodology employed by the consultant to develop the Sexual Exploitation and Abuse Action Plan.

1.7.1 Literature Review

A detailed review of the relevant secondary literature was conducted as a key methodology of the study. Documents reviewed included the following: -

- ESIA Report
- Network of Ethiopian Women’s Associations (NEWA), 2021:
- Ethiopian Gender Development Index 2021
- Ethiopia Demographic and Health Survey 2016,
- UNICEF, 2019. National Situation Analysis of Children and Women in Ethiopia.
- CSA, 2019. Regional-Level Gender Disaggregated Data Mining and Analysis Report. Addis Ababa, Ethiopia.
- CSA, 2017. Gender statistics Report. Addis Ababa, Ethiopia.

1.7.2 Primary Data Collection

The study used qualitative data collection methods specifically Focus Group Discussions (FGDs) and Key Informant Interviews (KIIs) to collect primary data from the identified stakeholders. This information was complemented by quantitative information from literature review.

2 LEGAL FRAMEWORK-POLICIES, LAWS AND REGULATIONS RELATED TO SEA/SH

The Ethiopian Government has shown a firm political commitment to the advancement of gender equality, women's rights and women's economic empowerment below are relevant laws and policies

2.1 Laws

- The 1995 Constitution of the FDRE also provides the basic principle that all persons are equal before the law and are entitled without any discrimination to equal protection under the law. The Constitution guarantees women's rights as equal to those of men in employment, marriage, and property ownership. It requires the State to enforce the rights of women to eliminate the influence of harmful traditional practices that cause bodily and mental harm against women.
- Ethiopia has also revised gender-discriminatory legal provisions in the Family Law (revised in 2000) and Penal Codes (revised in 2005), aimed at tackling gender-based violence, including child marriage and harmful traditional practices.
- **Penal Code:** Major government policies have laws on violence against women. This includes the Penal code which was revised to incorporate provisions for violence against women and improve the existing ones. Issue like Female Genital Mutilation/FGM is penalized. Other Harmful Traditional Practices (HTP) are penalized; Domestic Violence is introduced in the HTP (has attracted attention). The Code has also devoted a provision dealing with the rights of women and aiming at addressing the widely prevalent gender biased attitudes and practices. Related sub-articles with the issue under discussion have put emphasis on equal enjoyment of all constitutional rights and protections, equal rights in marriage, entitlement to affirmative action/measures, protection from harmful traditional practices/HTPS, right to maternity leave with full pay, right to consultation in projects affecting their lives, property rights (to acquire, administer, control, use and transfer), right to equality in employment (promotion, pay, pension entitlements), right to access family planning education and service, information and capacity.

2.1.1 Regional Constitutions

Regions have constitutions which by and large resemble and operate within the general framework of the federal constitution. The question of gender equality has been addressed meticulously in these documents. For instance, the regional governments of Oromia, Harar and Somali have their own gender policies and strategies. The policies are region specific and are adopted from the federal policies. For instance, these regions have their own regional gender mainstreaming manuals, and regional women and development package manuals, regional policy on women, regional family law following the revised family law at the federal level.

2.2 Legal Policy and Frameworks

Ethiopia has formulated/revised many policies, legal frameworks and strategic plans which are gender-sensitive details in the table below.

Table 2—I. Summary of SEA/SH Legal and Policy Frameworks

Policy/Document Title	Description
National Policy on Ethiopian Women (1993)	This policy institutionalises the political, economic, and social rights of women by creating appropriate structures in all sectors to empower women for equal opportunity and equitable access to resources and ensure equitable development for all Ethiopian men and women. It also envisages educating the public on harmful practices against women.
Constitution of the Federal Democratic Republic of Ethiopia (1995)	Article 35 guarantees equality between men and women in all spheres of political, social, and economic efforts and benefits.
Federal Family Code (2000)	This amendment raised the legal marriage age from 15 to 18 and emphasised equality in relation to managing the household and raising children.
Criminal Code of 2005	The law criminalises rape (article 620) and other forms of sexual violence (article 622), violence against a marriage partner or those cohabiting in an irregular union (article 564 and articles 555–560), FGM (article 566), marriage by abduction (article 587), child marriage article 648), tracking in women and children (article 597), and child sexual abuse (article 626-627).
Health Sector Development Plan (HSDP) 2005/06 – 2009/10	Promotes training for health extension workers on SEA/SH prevention as a key strategic activity.
National Action Plan for Gender Equality 2006–10	This plan aims to contribute to equality of men and women in social, political, and economic development by mainstreaming gender in all policies and programmes. It aims to reduce violence against women.
Strategic Plan for an Integrated and Multi- Sectoral Response to Violence against Women and Children and Child Justice in Ethiopia (2018)	The plan galvanized shared thinking around the merits of an integrated approach to addressing violence against women at policy level and across sectors and created a shared platform on how to advance such an approach.
Ethiopia’s Second Growth and Transformation Plan (GTP III)	The GTP III aims to eliminate violence and harmful traditional practices through measures including, public education and awareness creation programmes, public mobilisation particularly engaging women in the efforts against such practices, and swift enforcement of legal measures against harmful practices against women.
Health Response to Survivors of SEA/SH/SV (2016)	The manual is intended to facilitate 5-day training programmes for health workers.
National Strategic Plan and Action Plan on the Health Sector’s Response to SEA/SH: 2020–2025	The MOH has committed to respond to SEA/SH through this national strategic and action plan. Development was overseen by a technical working group, consisting of MOH-WCY Directorate, WHO Ethiopia, USAID Transform: Primary Healthcare Project/Pathfinder, UN Women, and the Ministry of

	Women, Children and Youth (MoWCYA). The World Bank provided financial support for the development of the plan.
Proclamation No. 916/2015	Requires all government institutions to address women's issues in policies, laws, and development programs and projects
Ethiopia 2030:	The Pathway to Prosperity Ten Years Perspective Development Plan (2021 – 2030) is women and youth centered.
The National Strategy and Action Plan on Harmful Traditional Practices against Women and Children in Ethiopia (2013)	Protects women and children against Harmful Traditional Practices
Proclamation No. 1064/2017	On federal civil servants, which provides for the prohibition of sexual harassment
Proclamation No. 909/2015	On the prevention and suppression of trafficking in persons and smuggling of migrants in and from Ethiopia
Education and Training Policy (1994)	Has general objectives such as developing the capacity of individuals by expanding education and, in particular, by providing basic education to all. The specified objective in relation to gender states that to gear education towards reorienting society's attitude and value pertaining to the role and contribution of women in development.
Health Policy (1993)	Has provisions on the status of women with particular emphasis on reproductive health i.e. reducing maternal mortality and HIV/AIDS and management of violence against victims. Reducing maternal mortality is one of the millennium goals of the Government of Ethiopia
Establishing hotlines for women and children experiencing violence, setting up more than 19 one-stop centres and rehabilitation centres, and strengthening existing ones.	

2.3 Regional Charters and Protocols

- The government of Ethiopia has signed many regional protocols and charters that enable women empowerment and gender equality they include;
- African Charter on the Rights of Women in Africa (Maputo Protocol in 2018). The Protocol requires all States to end all forms of VAW including unwanted or forced sex in the private or the public sphere.
- The African Charter on Human and Peoples' Rights on the Rights of Women in Africa addresses women's land and property rights. State parties are required to ensure that in the event of separation, divorce, or annulment of marriage, women and men shall have the right to an equitable sharing of the joint property deriving from the marriage; grant to women, whatever their marital status, access to adequate housing; promote women's access to and control over productive resources such as land; and guarantee their right to property (arts. 7, 16 and 19). The Protocol also provides that a widow has the right to an equitable share in the inheritance of the property of her husband and those women and men have the right to inherit, in equitable shares, their parents' properties (art. 21). In addition, the Protocol requires that State parties "take appropriate measures to ...

provide women with access to clean drinking water, sources of domestic fuel, land, and the means of producing nutritious food” in the context of women’s right to food security (art. 15).

- Economic, Social, and Cultural Rights in the African Charter on Human and Peoples’ Rights also recognize the principle of gender equality and women’s equal rights to property and land. Among other provisions, they state that the African States are obliged to “ensure equitable and non-discriminatory access, acquisition, ownership, inheritance, and control of land and housing, especially by women. This includes the obligation to take measures to modify or prohibit harmful social, cultural or other practices that prevent women and other members of vulnerable and disadvantaged groups from enjoying their property right, particularly to housing and land” (para. 55 (viii)).
- “Dakar Platform for Action” 1994 that focuses on health issues of African women giving attention to reproductive health rights.
- The Framework and Guidelines on Land Policy in Africa: adopted by the African Union in 2009, contains a specific section on strengthening the land rights of women.

2.4 International Treaties

Ethiopia has ratified a host of international and regional commitments on gender equality and women’s empowerment. Ethiopia ratified the Convention on Elimination of All Forms of Discrimination against Women (CEDAW) in 1981 and adopted the Beijing Platform for Action, which was declared in the Fourth World Conference on Women gathered in Beijing in September 1995. The government has signed up to the Sustainable Development Goals (SDGs), which include ending violence against women and girls by 2030 (SDG goal 5), and the Africa Renaissance Agenda 2063, committing to a specific goal on full gender equality in all spheres of life. The protocols contain some provisions on issues of women and environment such as the National Environmental Action Plan (NEAP), the Tropical Action Plan of FAO, National and Conservation Strategies of IUCN, etc. Other relevant gender international treaties and laws include;

- a) The International Covenant on Civil and Political Rights (ICCPR, 1976),
- b) The Universal declaration of Human Rights (UDHR, 1948),
- c) The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984),
- d) The Beijing Platform for Action (1995),
- e) UN Resolution 1325 (2000), the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (2000).

2.5 WB Good Practice Note

The WB Good Practice Note 2 (GPN) provides a comprehensive understanding of the nature and kinds of SEA/SH that project funded by the Bank may exacerbate. The GPN establishes an approach to identifying risks of SEA/SH, particularly sexual exploitation and abuse and sexual harassment that can emerge in major infrastructure projects with civil works contracts. The GPN builds on World Bank experience and good international industry practices, including those of other development partners.

The GPN which provides tailored information and tools to understand SEA/SH risks and considerations in infrastructure projects; addressing SEA/SH risks and capacities to respond using the Bank’s SEA/SH Risk Assessment Tool; addressing SEA/SH risks in design and implementation phases including during bid processes, codes of conduct with contractors and

laborers; safeguards to collect and respond to SEA/SH and SEA including Grievance Mechanisms, consultations and responding to SEA/SH incidents, and suggestions for improving safety of, and consultations with, women and girls throughout the project. Key Principles of GPN are summarized in the **table** below.

Table 2—2. Key Principles of World Bank Good Practice Note

Principles	Details
Reduce labor influx by tapping into the local workforce.	Depending on the size and the skill level of the local workforce, a share of the workers required for the project may be recruited locally. This is generally easier for unskilled workers, while more specialized staff (typically required in smaller numbers) frequently will be hired from elsewhere. Depending on the requirements of the project and their skill level, it may be possible to train local workers within a reasonable timeframe to meet project requirements. This may be more likely if such trained staff are needed afterwards for the operation and maintenance of the new infrastructure.
Assess and manage labor influx risk based on appropriate instruments.	This may range from broad requirements set out in the ESMP in a low-risk environment, to the need to develop more specialized instruments, such as a site-specific Labor Influx Management Plan and/or a Workers’ Camp Management Plan (or other instruments with similar purpose)
Incorporate social and environmental mitigation measures into the civil works contract.	Most adverse impacts from labor influx can only be mitigated by the contractor commissioned by the Borrower to carry out the works. It is therefore paramount that the responsibilities for managing these adverse impacts are clearly reflected as a contractual obligation, with appropriate mechanisms for addressing non-compliance.

2.6 Categorization of Sexual Exploitation and Abuse

The WB Guidance Note on SEA/SH describes SEA/SH as an ‘umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed gender differences.’ SEA/SH occur in a variety of ways, including through the infliction of physical, mental, and sexual harm or suffering threats of such acts, as well as coercion and other deprivations of liberty, such as early or forced marriage, economic abuse and denial of resources, services and opportunities, trafficking and abduction for exploitation, or Intimate Partner Violence (IPV) perpetrated by a former or current partner.

The WB defines SEA as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. This includes, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed goods, works, non-consulting services or consulting services is used to extract sexual gain. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment (SH) is understood as unwelcome sexual advances, requests for sexual favours, 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 on both. Both women and men can experience SH.

Each of the above SEA/SH forms has manifestations in several types and this list is by no means exhaustive;

- Sexual Violence: Rape, attempted rape, defilement, incest, sexual abuse, sexual exploitation, forced prostitution, sexual violence as a weapon of war and torture and trafficking for sexual exploitation.
- Physical Violence: This includes physical assault, human trafficking and slavery.
- Emotional/Psychological Violence: Verbal abuse, insults/humiliation, isolation, sexual harassment, confinement and intimate partner violence all fall under emotional/psychological violence.
- Harmful Traditional Practices: These include Female Genital Mutilation (FGM), Early Marriage, Forced Marriage, Infanticide and/or Neglect, widow inheritance and disinheritance.
- Socio-Economic Violence: This manifests itself through discrimination and/or Denial of Opportunities and Services, Social Exclusion/Ostracism based on gender, Obstructive Legislative Practice, Wife/Spouse Inheritance and Bigamy.

3 GENDER ANALYSIS AND GENDER BASED VIOLENCE CONTEXT AND RISK ASSESSMENT

3.1 Gender Based Violence: An Overview

Gender based violence is prevalent in Ethiopia according to the 2016 Ethiopia Demographic and Health Survey (EDHS)¹ which found that as many as 1 out of 4 or 26 per cent of women aged 15-49 experienced physical and/or sexual violence by an intimate partner or non-partner in their lifetime. More specifically, 23 per cent of women experienced physical violence since age 15 and 10 per cent experienced sexual violence at some point in their lives by either a husband or anyone else. Four per cent of women experienced physical violence during pregnancy. Among ever-married women age 15-49, as many as 1 in 3 or 34 per cent ever experienced spousal violence in the form of emotional, physical and/or sexual violence by their current or most recent husband/partner (24 per cent of ever-married women experienced emotional violence by their current or most recent husband/partner, 24 per cent experienced physical violence, and 10 per cent ever experienced sexual violence).² Only 23 per cent of women who experienced physical and/or sexual violence sought help, whereas 66 per cent of women never sought help and never told anyone about the violence.

Additional research shows that SEA/SH is widespread in Ethiopia. Wife beating is commonly accepted and adolescent girls are subject to harmful practices, such as female genital cutting, marriage by abduction, and early and forced marriage.³ Little information is available on married adolescents, but with child marriage rates estimated at up to 41%⁴, this large population faces especially difficult challenges in accessing health services—lack of information and poor perceptions about sexual and reproductive health, feeling of shame, fear of being seen by others, restrictive cultural norms, lack of privacy and confidentiality, and unavailability of services⁵. Girls and women face different forms of SEA/SH across their lifecycle, and the health system is often best placed to respond to SEA/SH given the frequency of girls' and women's interaction with it. In 2016, wife-beating was widely justified among women in Oromia and Afar⁶.

More than a third (35 %) of adolescent girls and adult women experienced some form of SEA/SH in 2016 in form of physical, psychological or sexual. Incidence was highest among adult women residing in Oromia and Gambella. The lowest rates of SEA/SH were reported in Somali: 4 % among adolescent girls and 10 % among adult women⁷. Percentage of ever-married women age 15-49 who have ever experienced physical, sexual, or emotional violence committed by their husband/partner among the project areas is high in Oromiya (38%), Gambella (34%) and Benishangul Gumuz (32%) and less than 30% in the case of SNNPR (29%), Dire Dawa (29%) and Afar (20%). The lowest rate in this regard is registered in Somali regional state which is 9%.⁸ CSA EDHS (2016) report finds that only 23 % of women who

¹ Ethiopia Demographic and Health Survey 2016,

² Ethiopia Demographic and Health Survey 2016, p. 305.

³ Federal Democratic Republic of Ethiopia Ministry of Women, Children and Youth Affairs. 2013. National Strategy and Action Plan on Harmful Traditional Practices against Women and Children in Ethiopia. Accessed November 13, 2023: http://www.africanchildinfo.net/clar/policy%20per%20country/2015%20Update/Ethiopia/ethiopia_htp_2013_en.pdf

⁴ The United Nations Children's Fund (UNICEF) 2016

⁵ Central Statistical Agency and Inner City Fund (ICF) 2016; Brhane and Kidane-Mariam 2016; USAID 2016

⁶ MOWCY, UNICEF Ethiopia and SPRI (2019): Gender Equality, Women's Empowerment and Child Wellbeing in Ethiopia.

⁷ Ibid

⁸ Central Statistical Agency (CSA) [Ethiopia] and ICF. 2016. Ethiopia Demographic and Health Survey 2016. Addis Ababa, Ethiopia, and Rockville, Maryland, USA: CSA and ICF. See on page 295.

experienced violence in 2016 sought help. The likelihood of help seeking was higher among women subjected to physical or psychological violence. Another important finding is that less than 11 % of SEA/SH victims sought help from formal institutions such as the police (8 %) or lawyers, doctors, medical personnel and social work organizations (jointly 2 or 3 percent). Neighbours, the victim's family and the partner's/husband's family were the most common sources of support that SEA/SH victims reached out to (CSA 2017, p.297)⁹. Figures for SEA/SH prevalence across wealth quintiles show no common pattern, especially among adolescent girls. Experience of SEA/SH is highest among adolescent girls in the middle and the richest wealth quintile. Among adult women, SEA/SH incidence is significantly higher across all wealth quintiles – ranging between 35 % and 39 % compared to the richest wealth quintile (at 29 %)¹⁰.

Agriculture in Ethiopia is the mainstay of over 80% of the population and women play important role in the sector. Even though women play significant role in agriculture, they have limited access to land and essential inputs and services. Central Statistics Agency (CSA) data in 2017/18¹¹ indicates that women agricultural holders constitute 19% of the total. For example, the average holding of women farmers is 0.65 hectares and that of men farmers is 1.1 hectares (CSA, 2017)¹². In addition, the data indicates that women have limited access to agricultural extension and input services. In 2018, the farmers who received agricultural extension women constitute only 16%, while the remaining 84% are men farmers, indicating male dominance in extension service use. About 36% of males and 8% females, respectively, have ready access to credit (CSA, 2017)¹³. This has resulted in lower productivity of women farmers compared to men. A study by the World Bank in 2014¹⁴ indicates that women produce 23% less per hectare than men farmers. In general, men have better access to agricultural services than women and this resulted in difference in agricultural productivity in favor of men.

The economic deprivation of women is mainly attributed to the lack of equal decision-making power, denial of inheritance rights and ineffective development programs. This finding was confirmed by information shared from Woredas' Women and Children Office experts during key informant interviews, which indicate that women in the Woredas face multiple forms of gender-based discrimination which limits them from having equal access resources and services. According to project Woredas women and children affair officials, even though some improvement has been observed in recent years, women still have low self- confidence and limited capacity to influence decision-making at household, community, and institutional levels. For instance, no woman is in a position of Kebele chairperson in all visited project affected Kebeles, but few women were working as professionals and other staff in governmental institutions in some Woredas. At the household and community level men are still considered superior they mainly hold public figure positions, are principal income earners, and provide ultimate authority at the household level and the community. Men always have the final say on different matters in all spheres of life.

The findings of the above studies indicate that SEA/SH is prevalent in the project area and the main forms of SEA/SH include Female Genital Mutilation (FGM), Early Marriage, Girl Abduction and Sexual Violence and Rape. The studies also reveal violence against women and

9 CSA, 2017. Gender statistics Report. Addis Ababa, Ethiopia.

10 MOWCY, UNICEF Ethiopia and SPRI (2019): Gender Equality, Women's Empowerment and Child Wellbeing in Ethiopia.

11 CSA, 2019. Regional-Level Gender Disaggregated Data Mining and Analysis Report. Addis Ababa, Ethiopia.

12 CSA, 2017. Gender statistics Report. Addis Ababa, Ethiopia.

13 Ibid

14 Levelling the field: Improving Opportunities for Women Farmers in Africa, WB, 2014.

girls (VAWG) is a pervasive problem in Ethiopia, a major challenge and threat to women's empowerment. The studies also established that harmful traditional practices are some of the drivers of SEA/SH which contributes to high HIV/AIDS incidences among women and other reproductive health issues. The project needs to put in place stringent mitigation measures to minimize SEA/SH cases.

3.2 Addressing SEA/SH/SEA/SH Risks in EAPP Project

3.2.1 World Bank Requirements

The World Bank Group recognizes that World Bank-financed Projects can increase the risk of SEA/SH in both public and private spaces by a range of perpetrators in several ways. Based on the protocol laid out in the WB SEA/SH Good Practice Note, a SEA/SH risk assessment was conducted, and it shows the likelihood of SEA/SH risks related to employees and community members. The assessment rates the level of risks at "moderate". The following are the risk factors:

- Both national lifetime prevalence of intimate partner violence (physical and sexual) and sexual violence and child marriage are likely to occur during the life of the project.
- Risk of SEA/SH by project personnel e.g., project employee with more money might entice women and young girls to engage in commercial sex work.

3.2.2 SEA/SH Programming Guiding Principles

- **Confidentiality:** At all stages of the intervention, the privacy and confidentiality of survivors will be assured, prioritizing the well-being of survivors and that the delivery of services and support will not compromise the privacy or identity of individuals involved.
- **Respect:** Respect of the wishes, dignity and choice of the survivors will be observed at all times and during all stages of any intervention. Survivors will be supported to give their free and informed consent, based on a clear understanding of the facts, implications, risks and consequences of an action, before information is shared or action is taken.
- **Safety and security:** Awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by SEA/SH will be sufficiently addressed and factored into any SEA/SH intervention or initiative.
- **Non-discrimination:** All SEA/SH interventions will be designed to ensure access and the same level of quality of care and assistance for all persons seeking support, or persons affected by SEA/SH, without regard to sex, sexual orientation, gender identity, age, ethnicity, religion or other status.

The Implementing partners will underpin all efforts to assess, prevent, respond to and monitor SEA/SH in the project for safe operations of all project activities. The approach taken will be:

- (i) Context-specific on solid understanding of the local legal and social context of SEA/SH.
- (ii) Survivor-centric having full respect to those affected/experienced and their wishes ensuring confidentiality.
- (iii) Collaborative work with internal and external stakeholders to identify risks, prevent SEA/SH and respond to reports.
- (iv) Inclusive, non-discriminatory and informed in addressing the risk of SEA/SH and providing access to independent, objective and non-judgmental spaces to discuss concerns.

3.2.3 SEA/SH Mitigation Measures

The following mitigation measures will be implemented during the pre-construction, construction, operation, and decommissioning phases to mitigate the risk of SEA/SH-SEA/SH.

- The project will develop and implement a SEA/SH risk assessment and management plan to mitigate and respond to SEA/SH cases, including a GRM that is sensitive and confidential.
- The project will ensure C-ESMP to be developed by contractors include SEA/SH Action Plan
- The project shall extend the Worker Code of Conduct to include guidelines on worker-community interactions and will provide training on the worker code of conduct to all employees including contractors and subcontractors as part of the induction process. CoC requirement to be included in bidding documents for contractors.
- Community sensitization including disseminating information on SEA and SH risks and management protocols.
- GRM will also be extended to the community.
- There will be 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 (where applicable) that signal to workers and the community that the project site is an area where SEA/SH is prohibited.
- Ensure training and sensitizing of workers on SEA/SH. These workers include civil works contractors (including sub-contractors and suppliers and their workers), supervising Engineers, consultants who may have a presence in the communities adjoining the project—as well as EAPP/PIU.

4 SEA/SH PREVENTION AND RESPONSE ACTION PLAN

4.1 SEA/SH Prevention

Gender power imbalance, prevalent gender inequalities, impunity and gender discrimination remain the root causes of SEA/SH in Ethiopia. While recognising that women, girls, men and boys face SEA/SH, women and girls nevertheless continue to be the most affected. The most prevalent types of SEA/SH include intimate partner violence, socio-economic, emotional and sexual violence, as well as harmful traditional practices, mainly female genital mutilation and early marriages.

Several interventions have been put in place to address SEA/SH in Ethiopia they include different legal instruments listed on chapter two of this document which protect women. In addition, first national strategy to combat SEA/SH in Ethiopia was developed for 2014-2016 where all past, current and planned efforts on SEA/SH prevention and response are embedded. The current prevention interventions are based on increasing awareness creation at the community level using existing community structures. Some of the activities include outreaches and focus group discussions to discuss measures to protect especially young girls from harmful traditional practices such as FGM and early marriages. Awareness creation session targeting men and boys are conducted in communities with a focus on how they could be active agents and role models in preventing SEA/SH. The national response programme includes all sectors which covers the following; individual case management, provision of material support, and referral to physical protection, medical and psychological services and, when available, to legal services.

4.2 Potential Project Related SEA/SH/Risks

Potential project related SEA/SH risks were identified and placed into five categories, details are in the table below.

Table 4—1. Potential SEA/SH Risks

Potential Risks and Impacts
1. Labor Influx
Demand for sex by migratory workers will increase SEA/SH
Sexual harassment within the labour camp and nearby community
Force and early marriage by construction workers
2. Displacement by Land Acquisition
Land acquisition induced poverty may lead the sexual activities by the poor girls and women with project employees
Land acquisition induced poverty may increase the risk of child marriage and other SEA/SH due to displacement by land acquisition
Land acquisition induced poverty may lead abandonment by spouse and intimate partner violence
3. Presence of Outsiders
Increased demand of outsider (employees & visitors) may enhance the risk of SEA/SH
Harassment of the community women during taking bath in river by the project workers, officials and contractor
Community school or college girls may be harassed or sexually abused by the project workers
Presence of outsiders in the community and interaction with them may create stigmatization for women which may result in early marriage for adolescent girls and intimate partner violence/divorce/abandonment for married women.
4. Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) in periphery areas
Women trafficking and rape may increase drastically due to low density of population and weak communication facility

5. Risk of SEA/SH at project related work
Project workers may tempt the community women and girls to achieve a job in exchange of sexual activity
Salary discrimination among the female workers

4.3 SEA/SH Referral Pathways for the Project

The recommended approach by the World Bank in managing SEA/SH incidents/cases is the survival centered approach, therefore the project team will ensure that there is sufficient security for the victims once reporting has been done. The survivors are also accorded support in the steps and tools required for reporting until the matter is resolved. The referral mechanism is an important tool for effective reporting and management of the case.

Table 4—2. Referral Mechanism Template

Reporting (Telling Someone and seeking help)			
Survivor/client tells colleagues, staff in charge, family, friend, community member or service provider. That person accompanies the survivor to the psychosocial entry point.		Survivor/client self-reports to any service provider	
IMMEDIATE RESPONSE			
The service provider must provide a safe, caring environment and respect the confidentiality and wishes of the survivor, learn the immediate needs and give honest and clear information about the available services. If agreed and requested by survivor, obtain informed consent and make referrals, accompany the survivor to assist her/him in accessing services.			
Medical/health care entry point- SEA/SH	Psychosocial support entry point - SEA/SH Adult	Psychosocial support entry point- SEA/SH Child – Under 18 /minor	
List of health facilities or other entities offering SEA/SH (SEA/SH) care and support at the Woreda/Kebele Woreda/Kebele level	Agencies (list agencies operating in the Woreda/Kebele)	The Children Services and other organizations involved in child protection.	
If the survivor wants to pursue police/legal action or if there are immediate safety and security risks, for example, if the survivor is a minor, refer and accompany survivor to the police/security or to the legal assistance for information.			
Safety and Security		Legal Assistance Counsellors	
AFTER IMMEDIATE RESPONSE, FOLLOW-UP AND OTHER SERVICES			
Over time and based on survivor’s choice can include any of the following			
Healthcare	Psychosocial Service/Case Management	Protection, Security and Justice Actors	Basic needs – Children’s services, safe shelter
Refer to facilities identified as able to handle SEA/SH cases (each Woreda/Kebele has facilities that manage SEA/SH.	This could be accessed at health facilities or through partners (CSOs, CBOs of FBOs)	Agency name: The Police, Ministry of Labor and Social Protection, National Gender Commission. SERVICES: <ul style="list-style-type: none">• Arrest perpetrator – police.• Gather evidence and complete file for case.• Inform survivor and witnesses on court hearing.• Provide physical protection/safe shelter	Agencies: Children services SERVICES: Livelihood program, life skills/vocational training/ entrepreneurship

		<ul style="list-style-type: none">• Provide legal counseling.• Offer transport, accommodation and meals for the survivor and witnesses and family members to attend court.	
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5 GRIEVANCE REDRESS MECHANISM

The project is committed to pursuing a survivor-centered approach for responding to SEA-SH. Survivor-centeredness requires that in seeking a resolution of allegations, the survivor's needs, wishes and rights will be central to the processes. This is done with the view to empower them and facilitate their healing and recovery. To this end, the project through its Grievance Redress Mechanism and its SEA-SH Implementing Framework will ensure that:

- The survivor will be treated with dignity and respect. Their needs, rights and choices will be taken into consideration at all times through all processes and decisions. Assistance will not be imposed on a survivor if they are not ready to proceed with a matter. However, support will be given to survivors who choose to seek redress or those who change their mind about whether they wish to take action or not.
- The survivor's choice and urgency will be respected in all decisions. However, where the survivor is a minor (under 18 years of age) there are legal requirements for reporting abuse to the authorities irrespective of their consent or choice.
- The welfare principle of the Best Interest of the child will be upheld in all cases where minors are involved.
- The safety and security of the survivor is of utmost consideration in all the processes. Every effort will be made by the project to eliminate or minimize the risk of further traumatization or abuse from the community or other project-related personnel to a survivor who reports a case.
- To address the security, retaliation, and safety of survivors, the project will ensure confidential handling of all data and information related to the survivors, and confidentiality in all processes leading to support for the survivor and the resolution of each matter. Sharing the story of the survivor with another agency or person will only be done with the informed consent of the survivor.
- Survivors will be provided with all the information needed for them to make informed decisions
- Assumptions will not be made about the survivor's feelings, thoughts and experiences. All persons who will handle reports and processes leading to resolution will be trained on how to handle complaints with cultural and social sensitivity, non-judgemental, confidentiality and tact.
- Where the alleged abuse is project-related or is perpetrated by an employee of a Company on the Project against another employee, every effort will be made to protect the survivor from retaliation, including reasonable re-arrangements of work location and schedule and special leave for the survivor if deemed necessary.

5.1 Proposed Grievance Mechanism

The Grievance Redress committee will be established at Woreda and Kebele levels. The committee will be established by woreda administration at the initial stage of the project implementation. The committee will constitute of three to five members varying at Kebele and woreda levels. The Woreda Committee will be drawn from the different Offices from office of Women and Social Affairs and the Kebele GRM committee members will be drawn from Kebele Cabinet members and representative of PAPs. Special considerations will be given for women and persons with disability in the composition of the committee.

The functions of each GRM Committee are as follows:

5.1.1 Kebele GRM Level

Complaints of PAPs provided on any aspect shall first be lodged either in writing or orally to the committee, which will be resolved by using customary rules and existing grievance resolution mechanisms. The Grievance Resolution Committee will try as much as possible to resolve the complaints raised. This will be achieved through series a of consultations, mediations and negotiations exercises conducted with the PAPs. If the grievance is not resolved, the case will be forwarded to Woreda GRM. The seat of the Kebele GRM committee will be at Kebele administration.

Both, Woreda and Kebele GRM committee will follow the following procedures:

- Registration of grievance: an aggrieved party registers a grievance at the Kebele office or with project liaison officer using “Grievance Registration Form” and within seven days the committee meeting is convened by the chair. The secretary of the committee will login the Grievance into the Grievance Register and the aggrieved person is informed of the scheduled hearing. A maximum of 7 days shall be given between the date the case is recorded and the date when the hearing is held;
- The committee will be meeting on a weekly basis to deal with emerging cases. At these meetings, hearings with the affected persons and related witnesses will be held;
- The committee will communicate its judgment to the affected persons within 7 days;
- If the PAPs will dissatisfy with the Kebele GRM committee judgment, the committee chairperson deliver the decision to Woreda (Appeal Hearing Council) within 7 days;
- If the PAP is still not satisfied with the judgment of Woreda GRM committee, he or she will be allowed to move his/her case to the next formal court

5.1.2 Woreda GRM Level

- Receive responses of complaints from Kebele GRM.
- Accept/receive grievance, complaints, and discontents from PAPs.
- The GRM committee will look at the scene/spot or investigate any available data to give fair decision; and
- Give response within one week.

5.2 Grievance Resolution Process

The grievance procedure will be simple and administered at the local levels to facilitate access, flexibility and ensure transparency. All the grievances will be managed through the Grievance Resolution Committees. Complaints will be received in writing or orally and will be filled in a Grievance Registration Form by the committee. The Steps for grievance redress are as follows:

- **First step:** Registration of the grievances with the Grievance Resolution Committee at Kebele level as discussed above. The committee will seek to verify genuine claims and engage with legitimate claimants endeavouring to reconcile the aggrieved PAP(s) concern or depending upon the issue to negotiate for a resolution. Where the complaint and grievance cannot be resolved by the committee, the complaint is referred to the Woreda GRM Committee.
- **Second step:** The Woreda GR committee receives grievance forwarded by the Kebele GRM committee concerning the aggrieved PAP(s) to resolve the issue. The Woreda GRM Committee having heard the concern, the meeting will respond to the aggrieved PAP(s) within one week of the date of the meeting.

- **Third step:** In instances where the project is unable to resolve the matter, the same will be referred to the Courts for settlement. The aggrieved PAP(s) have the right to pursue the matter up to the Supreme Court if necessary. The Woreda GRM committee will give all the necessary documents and information to the aggrieved PAPs, who are dissatisfied with the committee decision.
- **Fourth step:** court litigation process will be used as a last resort when either all the above procedures have failed or caused extensive delays to the project. The decisions of the action to be taken will be communicated to all involved parties mainly in Grievance resolution form.

All measures will be undertaken to ensure that the grievance is solved amicably between the concerned parties and the courts will be the last resort. Efficiency in solving of the grievances will be of paramount importance.

5.3 SEA/SH Related Grievance Redress Mechanism

Projects have a significant role to play in supporting safe spaces for women and children to report their experiences of violence. When SEA/SH related complaint is received at the first or second tier of GRM, the complaint should be kept confidential by the person/persons receiving the complaint. The complaint should be reported to the relevant committee and immediate actions should be taken that is consistent with the wishes and choices, rights and dignity of the complainant. The complainant should be given information in simple and clear terms on the steps for filing complaints and the possible outcomes, the timelines and the types of supports available to be able to make informed decision. For SEA/SH cases, it is important to ensure that access to the complaints processes is as easy and as safe as possible for the complainant survivor. The recording of incidence should be limited to the nature of complaint put exactly in the words of the complainant, the age of the survivor and to the best of their knowledge; the perpetrator's association to the project. The complainant should decide on whether they would like to be referred to the grievance committee and the complainant should give consent to share basic monitoring data. It should be noted that increases in the number of reported cases does not necessarily mean that SEA/SH incidents have increased but likely reflects improved mechanisms for safe and confidential reporting and increased interest in accessing SEA/SH support services.

5.3.1 Safety and Wellbeing

The safety of the survivor shall be ensured at all times including during reporting, investigation, and the provision of victim assistance. Those involved in the management of complaints will need to consider potential dangers and risks to all parties (including the survivor, the complainant if different, the subject of the complaint, and the organizations involved), and streamline ways to prevent additional harm in all the complaint handling process. The survivor is never to blame for reporting an act of SEA/SH and should never be victimized. It is important that she/he feels that her story is heard, believed and valued. The actions and responses of the complaint mechanism will be guided by respecting the choices, needs, rights, and the dignity of the survivor.

5.3.2 Confidentiality

The confidentiality of complainants, survivors, and other relevant parties must be respected at all times. All SEA/SH-related information must be kept confidential, identities must be protected, and the personal information about survivors should be collected and shared only with the informed consent of the person concerned and on a strict need-to-know basis.

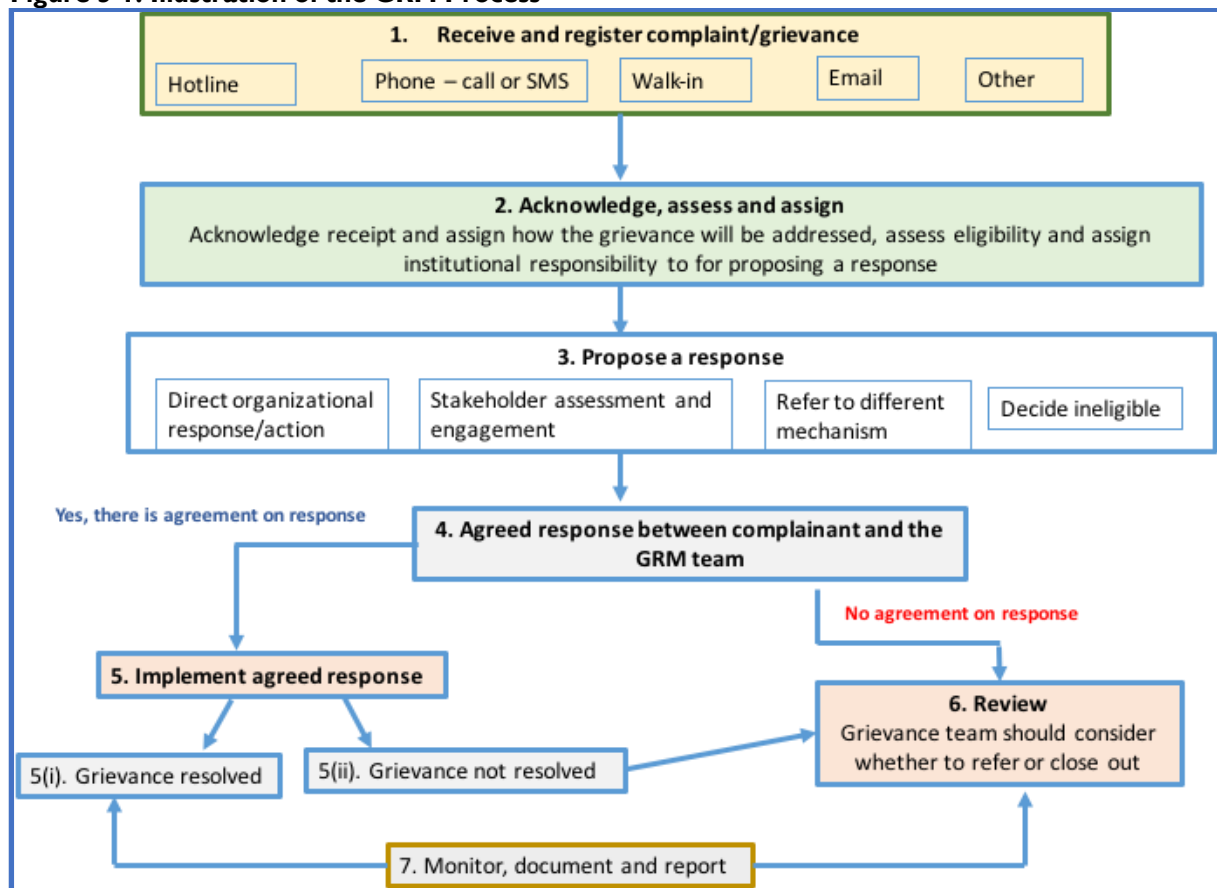
5.3.3 Survivor-Centred Approach

All prevention and responses action will need to balance the respect for due process with the requirements of a survivor-centered approach in which the survivor’s choices, needs, safety, and wellbeing remain at the center in all matters and procedures. As such, all actions taken should be guided by respect for choices, needs, rights and dignity of the survivor, whose resilience must be fostered through the complaint process.

5.3.4 Accessibility and non-discrimination

The GRM must be accessible to all potential complainants and sufficient information must be given on how to make the complaints process accessible to the largest possible number of people. This includes identifying and instituting various entry points that are both gender and context sensitive. To facilitate incidents reporting and avoid stigmatization, reports from third parties (witnesses, people suspicious or aware of an incident, etc.) must also follow accountability protocols.

Figure 5-1. Illustration of the GRM Process



5.4 SEA/SH Grievance Redress Pathways

Grievances related to SEA/SH reported through the GRM will be handled with anonymity and swift actions that are survivor centered. The first step to take when SEA/SH (sexual exploitation and abuse, sexual harassment, rape, other types of SEA/SH, etc.) related complaints is submitted to the first- tier grievance mechanism is to immediately refer the SEA/SH survivor to support services within the SEA/SH Referral Pathway. The four main components of the SEA/SH Referral Pathway are health care services, psychosocial support services, legal and justice services and security and protection services (police). The project will ensure survivors access the service needed. Grievances from the project dedicated

complainant box will be collected and reviewed by the institution’s grievance committee on a timely manner, like a biweekly basis. Grievances can be received in person, verbally via phone, in writing or via email, text message or any other media. Grievances submitted anonymously could be submitted through the complainant box. Grievances received will be recorded. All grievances will be acknowledged by telephone or in writing by the grievance body of the institution using the grievance acknowledgment form within three days of receipt and the complainant informed of the approximate timeline for addressing the complaint, if it can’t be addressed immediately. Below is a table with details of the grievance Pathways.

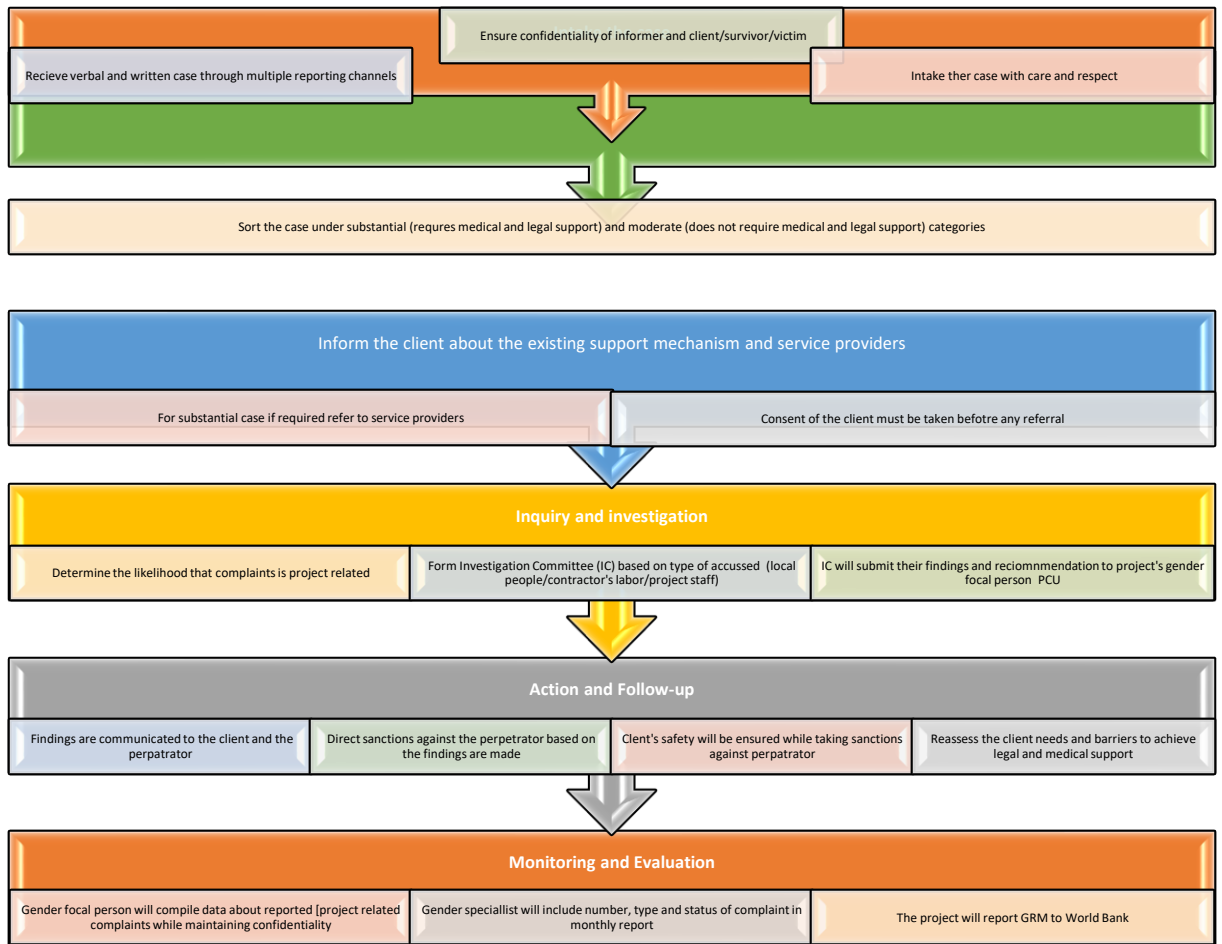
Table 5—I. Grievance Pathways

Health Care	<ul style="list-style-type: none"> • Health posts • Health Centers • Hospitals
Police	<ul style="list-style-type: none"> • Victim Support Unit (community Policing) • Community Crime Prevention team
Legal Support	<ul style="list-style-type: none"> • Woreda court • Lawyers Association/ legal service providers team
Psychosocial Support	<ul style="list-style-type: none"> • Woreda women and Social affairs office • Local & International NGOs
Community Advocates	<ul style="list-style-type: none"> • Traditional leaders, faith-based organizations, Community based organizations/CBOs, women's groups, youth group

5.4.1 Building Grievance Redress Mechanism Awareness

The project through the gender expert will initially brief all project stakeholders such as employees of the project, consultants, contractors and sub-contractors on existence of the SEA/SH Grievance Redress Mechanism of the Project and explain to them the procedures and formats to be used including the reporting procedures. Awareness campaigns will be conducted targeting project stakeholders to inform them of the availability of the various GRMs. Notice board will be erected in the project areas indicating the existence of the mechanism and a phone number, email and address for further information. The GRM process will be translated into local languages, if needed.

Figure 5-2. GRM Process Flow Chart



6 SEA/SH PREVENTION AND RESPONSE ACTION PLAN/MATRIX

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
1	Sensitize the key IPs on the importance of addressing SEA/SH on the project, and the mechanisms that will be implemented						
a)	Training IP/PMU (Management/leadership) on SEA/SH to include Accountability and response framework Responsibilities and reporting Confidentiality and whistle blower protection clauses	Develop ToR Secure technical expertise, Prepare the training module and materials Conduct training for targeted members of EAPP Implementing partners Include SEA/SH as an agenda in quarterly meetings	Quarter 1 following the commencement of the project Quarterly (Throughout Project implementation.)	PCU- project office SEA/SH Specialist/Social development specialists, External Facilitators/ Nominated Service providers (NSPs)	PMU	Number of trainings conducted Number of IPA (Management/leadership) members trained	PMU- 10,800 USD
b)	Sensitizing the PCUs, and integrating the SEA/SH into the project	Organize meeting with implementing partners to sensitize them about the need of incorporating SEA/SH action plan into the Project Clearly define the SEA/SH risks, requirements and expectations and the associated cost in the ESMP Ensure IP has a SEA/SH specialist to support project implementation. Rapid assessment on extent to which training providing institutions are safe spaces; and review existing SEA/SH policies, procedures and grievance reporting mechanisms in such institutions.	Project Preparation (PAD preparation) Project Preparation Project Preparation PCU strengthening Two months after project effectiveness	PCU- project office SEA/SH Specialist/Social development specialists, External Facilitators/ Nominated Service providers (NSPs)	PMU, WB	Number of training conducted Number of IP (Management/leadership) members trained Integrating SEA/SH risks, requirements and expectations and the associated cost in the ESMF, GAP as per the Mitigation Plan, and ESMP Number of assessments conducted	PCU- 11,000 USD

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
c)	Create awareness on SEA/SH	Prepare relevant communication materials on SEA/SH and disseminate these materials Develop an awareness-raising campaign on SEA/SH to raise awareness among all stakeholders	During the project preparation and at the beginning of the implementation At the beginning of the implementation	PCU- project office SEA/SH Specialist/Social development specialists, External Facilitators/ Nominated Service providers (NSPs)	PCU, WB	Number of communication materials disseminated Number of awareness raising campaigns conducted	PCU-7,000 USD
2	Conduct SEA/SH/SEA assessment at project sites						
a)	Conduct a SEA risk assessment in project area to inform risk mitigation strategies	Use in house PCU staff or hire independent consultant/Nominate Service Provider to conduct the assessment	First quarter after commencement of the project	PCU staff or hire independent consultant/Nominate Service Provider (NSPs)	PCU	SEA risk report	EAPP-PIU/EEP-PIU 10,200 USD
3	Map out SEA/SH/SEA prevention and response service providers						
a)	Map out and review capacity and quality of SEA/VAC service Providers in the project area	Procure qualified consulting firm/ NSP to conduct the assessment Conduct field visits to identify, and map out key actors and service providers on SEA in project area Develop tools for assessing capacity of SEA service providers Conduct organizational capacity assessment	First quarter after commencement of the project First quarter as part of the baseline data	EAPP-PIU/EEP-PIU EAPP-PIU/EEP-PIU, NSP, Resident Engineers. SEA/SH/SEA Specialist	EAPP-PIU/EEP-PIU	SEA service provider mapping and Capacity Assessment Report Organizational Capacity Assessment Report	EAPP-PIU/EEP-PIU 15,000 USD
c)	Develop/update SEA/SH/SEA referral pathway(s)	On the basis of mapped SEA prevention and response service providers develop/update a SEA/VAC referral list for service providers. Disseminate the referral pathway/list to all stakeholders	First quarter after the commencement of the project Maintained throughout Project implementation.	EAPP-PIU/EEP-PIU/Consultant or NSP, contractor	EAPP-PIU/EEP-PIU	Referral pathway developed/updated Number/type of SEA preventive and response services available.	EAPP-PIU/EEP-PIU 6,000 USD

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
						No. of referrals of SEA/SH incidents to the project GRM	
4	Strengthen Institutional capacity for SEA risk mitigation and response						
a)	Engage/hire a SEA Specialist in PCU project office or wherever appropriate to supervise EAPP project implementation to supervise and provide technical support for the implementation of SEA Action Plan	Procure services of a qualified and competent SEA specialist to supervise and provide technical support for the implementation of SEA in projects	At the end of the project preparation	EAPP-PIU/EEP-PIU	EAPP-PIU/EEP-PIU	Qualified SEA/SH specialist hired	EAPP-PIU/EEP-PIU 20,000 USD
b)	Support capacity of local support systems to prevent and respond to SEA (police, health, legal system) Strengthen the reporting mechanisms & procedures of local systems Strengthen a survivor centered referral and response. Strengthen coordination for better services with local/national SEA service providers	Identify key stakeholders to engage Develop training plan Develop training material/ content using global/national standards, human rights and survivor centered approaches Conduct training and mentoring Conduct regular coordination meetings with service providers for effective referrals	Maintained throughout Project implementation.	EAPP-PIU/EEP-PIU SEA/SH specialist/Social development specialist; other IPs SEA/SH focal persons, consultants hired to support SEA/SH interventions, SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU Contractor	Number of trainings conducted Number of coordination meetings conducted Level of satisfaction of SEA survivors with services received Level of Community awareness about SEA/SH and SEA referral pathway	EAPP-PIU/EEP-PIU 15,000 USD
c)	Evaluate the IPs, and community actors' ability to prevent and mitigate SEA/SH risks	Rapid Quality assessment of PCU's existing policies (including human resource manual, community operational manual) and grievance reporting mechanisms and identify gaps in SEA/SH prevention, response and safeguarding measures. The action plan will be revised based on the above mentioned- assessment Evaluate other stakeholders, and community groups' ability to meet project's SEA/SH prevention and	Within 6 months of effectiveness	EAPP-PIU/EEP-PIU /SEA/SH specialist with support from World Bank	EAPP-PIU/EEP-PIU	Number of capacity assessment conducted Level of satisfaction of SEA survivors with services received Level of Community awareness about SEA referral pathway	EAPP-PIU/EEP-PIU -10,000 USD

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
		response requirements prior to finalizing the contract.					
5	Integrate SEA/SH/SEA risk management in Contractors' Environment and Social Management Plan (ESMP)						
a)	Incorporate SEA risk in the contractors Environment and Social Management Plan (ESMP)	Integrate SEA/SH/VAC considerations in the contractor Environment and Social Management Plan (ESMP)	First quarter and after signing of the works contract of all IPs.	Contractor, Supervised by EAPP-PIU/EEP-PIU provide support	EAPP-PIU/EEP-PIU	Updated ESMP with SEA/SH/VAC action plan (management plan)	All IPs to allocate budget
b)	Develop and establish/review SEA/SH response and accountability framework to include: Allegation Procedures to report SEA incidents and internally for case accountability procedures which should clearly lay out confidentiality requirements for dealing with cases	Develop/review SEA Allegation Procedures to report SEA/SH issues Inform employees and the community on how to report cases of SEA/SH, CoC breaches to the GRM, and how such cases are handled Develop mechanisms to hold accountable alleged perpetrators; disciplinary action for violation of CoC by workers.	Quarter 2 after commencement of project During project implementation.	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU	An established and functional accountability framework	All IPs to allocate budget
c)	Clearly reflect SEA/SH risks and requirements in the safeguard instruments and expectations in Contract Operation and Management (COM)	Formulate and adopt SEA/SH informed COM. Provide orientation on COM updates	Prior to floating of bids	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU	An established and functional accountability framework	All IPs to allocate budget
d)	Integrating SEA/SH into the project Documents	Update the SEA/SH Action Plan as per the detailed information of the project and updated SA, RF and ESMF Clearly define and integrate the SEA/SH requirements and expectations in the bid documents and relevant Terms of References (TORs).	Bidding/Tendering Same as above	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU	An established and functional accountability framework	All IPs to allocate budget

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
		<p>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 and relevant TORs for a CoC which addresses SEA/SH.</p> <p>The procurement documents should set out clearly how adequate SEA/SH 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 SEA/SH 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 SEA/SH service providers, if necessary)</p> <p>Evaluate the contractor's SEA/SH response proposal in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's SEA/SH requirements</p>	<p>Same as above</p> <p>Same as above</p> <p>Bid evaluation</p>				
e)	Improve infrastructure and create environment for women workers	<p>Have separate, safe and easily accessible facilities for women and men working on the site. Latrines should be located in separate areas, well-lit and include the ability to be locked from the inside.</p> <p>Visibly display signs around the project site (if applicable) that</p>	Before mobilization on the site	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU	An established and functional accountability framework	All IPs to allocate budget

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
		signal the workers and the community that SEA/SH is prohibited in the project site					
6	Review the IA's capacity to prevent and respond to SEA						
a)	Recruit/train an officer on SEA/SH specific skills to support supervise issues related	Recruit/train an officer with SEA/SH skills	In the first Quarter of the project	EAPP-PIU/EEP-PIU	EAPP-PIU/EEP-PIU	A qualified and competent SEA/SH/VAC staff recruited	Covered under 4 (a)
b)	Develop M&E programme	Develop a comprehensive M&E plan to monitor work plan implementation Monitor SEA/SH Implementation Plan	In Quarter 2 after project implementation started Maintained throughout Project implementation.	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU	M&E framework in place	All IPs to allocate budget
c)	Conduct SEA/SH orientation training for project staff	Develop a training plan Develop training materials Conduct training for project staff	Quarter 2 after the commencement of the project Retraining during Project implementation.	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU contractor	Number of training conducted for project staff Percentage of workers that have attended CoC training.	All IPs to allocate budget
d)	Compliance Monitoring and Reporting	Prepare a set of key performance indicators (KPIs) for monitoring SEA/SH risks and tracking progress. A monitoring plan with multiple methods, tailored to local contexts and relevant to project operations will be prepared Prepare and submit quarterly monitoring report to the Bank	Before implementation Same as above Throughout the project implementation	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU contractor	Number of performance report prepared Number of monitoring plan prepared and implemented Number of quarterly reports prepared and submitted	All IPs to allocate budget

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
		covering all aspects of the SEA/SH activities and services delivered as per the action plan					
7	Inform project affected communities about SEA/SH risks						
a)	Establish partnerships with CBOs/CSO's and local government institution	Identify and select partners and officially inform them Engage partners, conducting joint community meetings and awareness raising	First quarter after the commencement of the project Maintained throughout Project implementation.	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU Contractor	Number of partnerships formed	All IPs to allocate budget
b)	Identify, train and establish community focal point for SEA/VAC activities	Establish a trained, dedicated and committed network of community focal persons	First quarter after the commencement of the project Maintained throughout Project implementation.	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU contractor	No. of focal points and persons identified and trained	All IPs to allocate budget
c)	Develop Stakeholder Engagement Plan for SEA related issues	Develop a comprehensive SEA Stakeholder Plan	First quarter after the commencement of the project Maintained throughout Project implementation.	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	EAPP-PIU/EEP-PIU contractor	Stakeholder Implementation plan developed	All IPs to allocate budget
d)	Develop information dissemination strategy	Develop a strategy Identify the methods to disseminate the information Disclosure of information to stakeholders through multimedia outlets	First quarter after the commencement of the project	EAPP-PIU/EEP-PIU SEA/SH Specialist/Social development specialist	EAPP-PIU/EEP-PIU Contractor	SEA communication strategy in place	All IPs to allocate budget

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
			Maintained throughout Project implementation.	SEA/SH focal persons/staff of contractor			
e)	Develop relevant SEA/SH prevention and response advocacy and information dissemination materials for community engagements	Develop relevant advocacy and information dissemination materials translated in local languages of the project location	Second quarter Maintained throughout Project implementation.	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PIU, Contractor	No and type of SEA IEC material developed	All IPs to allocate budget
g)	Conduct community sensitization	Develop a Community SEA and VAC sensitization program, material and messages Conduct community sensitization	First quarter after the commencement of the project Maintained throughout Project implementation.	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PCU contractor	Number of community sensitization conducted	All IPs to allocate budget
	Prevention of abuse of power that comes with the project (e.g. decisions on employment, allocation of project resources, etc.)	Strengthening awareness raising activities on household use decisions on employment, allocation of project resources capacity at community and household level in addition to appeals committee on how to address cases of abuse of power;	Maintained throughout Project implementation.	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PCU contractor	Number of awareness raising sessions on the prevention of power abuse	All IPs to allocate budget
8	SEA/SH/SEA sensitive channels for reporting in GRM						
a)	Develop/Review GRM for specific SEA/SH procedures	Undertake internal review of GRM for SEA mitigation Integrate SEA entry points within the GRM with clear procedures	First quarter after the commencement of the project	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PCU contractor	GRM with SEA procedure integrated In the GRM	All IPs to allocate budget
b)	Identify and train SEA/SH focal points within the GMC who will be responsible	Identify and select SEA focal persons within the GRC	During Quarter 2 following signing	PCU SEA/SH Specialist/Social	PCU	SEA/SH focal points selected and trained	Covered under 7 (b)

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
	SEA cases and referrals to the NSP and or other relevant stakeholders as defined in the referral pathway.	Clarify the role of the focal points in SEA/SH as referral points Train the focal points on SEA/SH basics and the referral pathway	of the works contract Retraining during project implementation.	development specialist SEA/SH focal persons/staff of contractor	contractor		
c)	Review GRM reports/logs for SEA sensitivity	Review logs for SEA documentation to ensure it follows standards for documenting SEA/SH/SEA cases	During project implementation.	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PCU Contractor	Number of SEA cases documented	All IPs to allocate budget
9	Define and reinforce SEA/SH/SEA/SH requirements in procurement processes and contracts						
a)	Incorporate SEA/Requirements and expectations in the contractor and consultants' contracts.	Ensure that SEA issues are incorporated in all contracts signed by contractors and consultants	During project implementation.	PCU SEA/SH Specialist/Social development specialist	PCU World Bank	SEA standards in procurement/contract document	All IPs to allocate budget
b)	Allocation of funds for SEA/SH related costs in procurement documents.	Clearly define SEA/SH requirements and expectations in the bid documents	During preparation of bid and Contract documents		PCU, World Bank	Bid documents with clearly defined SEA/SH requirements Contract documents with clearly defined SEA/SH clauses/requirements	PCU-6,000 USD
c)	Workers (Contractor/consultant) sensitization on SEA/SH.	Develop a training plan for workers, contractors and consultants Conduct training on SEA/SH risks, responsibilities and legal/policy requirements	Quarter 2 after commencement of the project During project implementation.	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PCU Contractor	Number of contractors' and consultants staff trained,	All IPs to allocate budget

#	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible body	Monitoring (Who will monitor)	Output indicators	Estimated Budgets
d)	Codes of Conduct signed and understood. 1) 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 staff on the behavior obligations under the CoCs. Disseminate CoCs (including visual illustrations) and discuss with employees and local communities. ○ Create an appropriate Accountability and Response Framework	Define the requirements to be included in the CoC which addresses SEA/SH Review CoC for provisions/clauses that guard against SEA/SH 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.	During Project implementation	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PCU Contractor	Percentage of workers that have signed a CoC	All IPs to allocate budget
10	Separate toilet and shower facilities for men and women and SEA-free signage						
a)	Provide separate facilities for men and women and display signs, posters and pamphlets around the project site that signal to workers and the community that the project site is an area where SEA/SH/SEA is prohibited	Provide separate facilities Design and print pamphlets and posters. Distribute the pamphlets and posters to the project site Install signage on the facilities visit Project gangs/camps to check on the availability and usability of separate sanitary facilities.	At the commencement of the project During project implementation	PCU SEA/SH Specialist/Social development specialist SEA/SH focal persons/staff of contractor	PCU, contractor	Separate toilet and shower facilities for men and women Display signs/IEC materials	All IPs to allocate budget
Total							105,000 USD

7 MONITORING AND EVALUATION

Monitoring and evaluation plays a key role in assessing the effectiveness of mitigation measures put in place. The main purpose of monitoring is recording information to track the performance of the system by comparing its outcomes against certain previously established benchmark indicators or program's management requirements. Therefore, it is essential that the project monitor GAP activities. This entails good record keeping. Key issues to be considered in the monitoring and evaluation process include the following:

- Involvement of an adequate women representation in the construction phase and implementation of the resettlement plan.
- Promoting an active participation of women and other vulnerable groups in all of the resettlement operations.
- Ensuring the setting-up of project level office which includes women participation and that the project authorities and the community members continue to include women in the construction.
- Ensuring that implementation of gender-aspects is reviewed and reported by the staff member undertaking the monitoring.

Monitored will be done at two levels: (i) by the project authorities, both internally and externally, and (ii) by the community members themselves through their active participation. PIU is responsible for monitoring and reporting of GAP key performance indicators, including the participation of women, target works and trainings, and HIV prevention campaign. Therefore, EAPP-PIU/EEP-PIU Gender Based Violence Specialist will monitor implementation of the GAP routinely as part of the broader management of the Project. These reports will be made available to the public and other external stakeholders to review if required.

7.1 Reporting

Monthly progress reports shall be prepared by project M&E team and a Quarterly GAP Progress Report covering implementation summary should provide the following:

- Summary of implementation of agreed Action Plan for the quarter;
- Number of employed staff by the project (gender disaggregated);
- Number of training courses related to SEA/SH delivered
- Number of workers that have attended the GRM training.
- The number of grievances logged in the proceeding period by level and type;
- The number of grievances resolved between the project and complainant, without accessing legal or third-party mediators, by level and type;
- Project responses to concerns raised by women/women groups and other stakeholders
- Objectives and targets for the following quarter

8 BUDGET

The implementing agencies will keep provisions for adequate budget for implementation of the SEA/SH-SEA/SH Action Plan. The table below presents an initial estimation of the cost of the SEA/SH Action Plan components based on the budget for previous projects as well as similar activities conducted for other World Bank projects. The budget will be updated and finalized once the SEA/SH specialist is on board.

Table 8—I. Summary of budget for SEA/SH-SEA/SH AP implementation

S.No	Cost Items	USD \$
1	The Preparation and development of gender strategy	20,000
2	Baseline gender survey	10,000
3	Ensure women's participation in project activities and benefits	20,000
4	Consultation with stakeholders and communities in project areas	20,000
5	Targeted leadership trainings for women in the executive committees	20,000
6	Gender specialist	Included in staff costs
7	Strengthen institutional capacity for SEA/SH (internal capacity building sessions: 2 x 10,000)	20,000
8	Prevention, capacity building and communication on SEA/SH/SEA/SH for IPs, contractors, and communities (10 training sessions per year for IPs 10 x 200 USD; 15 training sessions per year to contractors 15 x 500)	19,000
9	SEA/SH requirements in tender processes	Included in staff costs
10	Conduct SEA/SH risks assessments at project sites (travel of SEA/SH Specialist to project site for assessment, 20 x 2,500)	50,000
11	SEA/SH reporting protocol & referral pathways (travel of SEA/SH Specialist to enter agreements with local service providers)	30,000
12	Monitoring and supervision of the SEA/SH-SEA/SH Action Plan (Gender Specialist travel to different subproject sites)	20,000/ included in TPM costs
	Total	USD 229,000
	Contingency (10%)	USD 22,900
	Grand total	USD 251,900

9 APPENDIX

9.1 Appendix A. Code of Conduct (CoC) To Prevent SEA/SH Related Risks

Introduction

EAPP-PIU/EEP-PIU are committed to ensure a work environment which minimizes any negative impacts on the local communities, and its workers. EAPP-PIU/EEP-PIU also strongly commits to create and maintain a safe working environment where Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) have no place, and where these will not be tolerated by any employees of contractors, sub-contractor, supplier, supervising engineers, and other consultants. The purpose of this Code of Conduct is to:

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

EAPP-PIU/EEP-PIU will adhere to the following and may add during implementation any additional requirements to address identified issues. The types of issues identified could include risks associated with labor influx, Sexual Exploitation and Sexual Abuse (SEA), sexual harassment (SH) in the workplace, etc. The IAs will advise the bidders and/or contractors to submit their own code of conduct form as part of bids for construction works.

I. Definitions

The various words and concepts use in the COC are defined below for the purpose of clarity. These will be further discussed during training and orientation sessions by the PIU with relevant stakeholders. Sexual Exploitation and Abuse (SEA)¹⁵ : 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 another¹⁶.

Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions¹⁷

Sexual Harassment:¹⁸Any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature¹⁹.

Consent: 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

¹⁵ As defined in the UN Secretary's bulletin – Special Measures for protection from sexual exploitation and abuse October 9, 2003 ST/SGB/2003/13

¹⁶ World Bank, Good practice note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment project financing involving major civil works, 2020.

¹⁷ UN Glossary on Sexual Exploitation and Abuse 2017, pg.).

¹⁸ Inter-Agency Standing Committee Protection against Sexual Exploitation and Abuse (PSEA): Interagency cooperation in community-based complaint mechanism. Global standard Operating Procedures. May 2016

¹⁹ EFS Good Practice Note on SEA/SH in Major Civil Works

as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent.

Under this Code of Conduct consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.

There is no consent when agreement is obtained through (i) the use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation; (ii) the use of a threat to withhold a benefit to which the person is already entitled; and (iii) a promise is made to the person to provide a benefit. While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual harassment which constitute gross misconduct, are grounds for termination or other consequences related to employment and employment status.

II. Examples of Exploitation and Abuse

The following constitute examples of sexual exploitation and violence.

- (i) Unwanted sexual comments, jokes, question, whistling, asking about sexual fantasies/ history to any member of the community.
- (ii) Sexually suggestive signals (facial expressions, winking, throwing kisses, or licking lips, making sexual gestures with hands or through body movements).
- (iii) Touching clothing, hair, or body, hugs, kiss, stroke or rub oneself sexually around any community member
- (iv) Unwanted pressure for dates
- (v) Any propose a woman in the community that he can get them jobs related to the work site (cooking and cleaning) in exchange for sex.
- (vi) Telling a woman applying for a job that he will only hire her if she has sex with him.
- (vii) Begin 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.
- (viii) Actual or attempt to rapes anyone.

III. Examples of Sexual Harassment in Work Place

- (I) Male staff comment on female staffs' appearances (both positive and negative) and sexual desirability.
- (II) Male staff makes unwanted sexual comments, jokes, question, whistling, asking about sexual fantasies/ history to any female staff/ co-worker.
- (III) Male staff makes sexually suggestive signals (facial expressions, winking, throwing kisses, or licking lips, making sexual gestures with hands or through body movements) towards a female staff.
- (IV) Male staff makes unwanted pressure for dates.
- (V) A male staff touches female staff members' buttocks or any part of the body when he passes her at work.
- (VI) A male staff member tells a female staff member he will get her a raise if she sends him naked photographs of her do a sexual favor.

(VII) When a female staff complains about comments male staff are making about her appearance, they say she is “asking for it” because of how she dresses.

IV. Examples of Commitment by Company and/or Worker

I, _____, acknowledge that sexual exploitation and abuse (SEA) and sexual harassment, are prohibited. As an (employee/contractor) of (contracted agency /sub-contracted agency) in Ethiopia, 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 further understand SEA and SH activities are grounds for sanctions, penalties or potential termination of employment. Prosecution of those who commit SEA and SH act 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 act, 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 PCU. The safety, consent, and consequences for the person who has suffered the exploitation/ abuse/ harassment will be part of my consideration when reporting as per the SEA/SH Procedures and Response Protocol. 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 incident. Any such actions will be a breach of this Individual Code of Conduct. I acknowledge that I have read the Individual Code of Conduct, do agree to comply with the standards contained in this document, and understand my roles and responsibilities to prevent and potentially report SEA and SHA issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated by this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.

Signature: _____

Name: _____

Title: _____

Date: _____

9.2 Appendix B: SEA/SH/SEAH Reporting Format

Incident Details	Remarks	Guiding Notes
Type of violation		SEAH (staff) SEA/SH (third party)
Nature of incident reported		Basic facts of the incident. What was reported by the complainant (in his or her own words). Is the incident related to the project?
Source of information		Community Focal Point, GRM Operator, email, other (specify)
Where did the incident occur		Region/Woreda/Kebele
When did it occur		Date
Additional information (if available)		Age, Sex
<p>The identity and safety of a survivor must be protected at all times. No personal data or identifying information about a survivor or their experience can be shared through this document. Personal/identifying information includes the survivor's name, perpetrator(s) name, date of birth, home address, the exact time and place the incident took place, visible disability, residence status e.g. minority</p>		

9.3 Appendix C. Workplace Sexual Harassment

- Engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity, or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome or
- Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Purpose of the Policy

EAPP-PIU/EEP-PIU is committed to preventing workplace violence and harassment. This policy defines behavior that constitutes workplace violence and harassment, and explains procedures for reporting and resolving such incidents.

EAPP-PIU/EEP-PIU is committed to providing a working environment free of violence and harassment by familiarizing all workplace parties with the related terminology as well as their individual responsibilities for prevention and corrective action.

Policy Statement

The management of EAPP-PIU/EEP-PIU recognizes the potential for violence and harassment in the workplace. The project will not tolerate any type of violence or harassment within the workplace or during work-related activities. The project is committed to allotting whatever time, attention, authority and resources necessary to ensure a safe and healthy working environment for all employees and clients to whom we provide care.

EAPP-PIU/EEP-PIU will take every reasonable precaution to protect an employee from physical injury if we become aware, or believe, that domestic violence is a risk.