



Federal Government of Somalia
Ministry of Interior, Federal Affairs and Reconciliation

**Strengthening Social Cohesion, Inclusion and Resilience through Community
Institutions**
(P508408)

**Sexual Exploitation and Abuse/ Sexual Harassment (SEA/SH) Prevention and
Response Action Plan**

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Abbreviations

ARC	American Refugee Committee
CBOs	Community Based Organizations
CDD	Community Driven Development
CEDAW	Convention for Elimination of Discrimination against Women
CLD	Community and Local Development
CoC	Code of Conduct
CRC	Convention on the Rights of the Child
CRSV	Conflict-Related Sexual Violence
CSO	Civil Society Organizations
DG	Director General
E&S	Environmental and Social Risk
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards 2
FCV	Fragile, conflict or violence affected
FGDs	Focus Group Discussions
FGM	Female Genital Mutilation
FGM/C	Female Genital Mutilation or Cutting
FGS	Federal Government of Somalia
FMS	Federal Member States
GBV	Gender-Based Violence
GM	Grievance Mechanism
GPN	Good Practice Note ⁴
HIV and AIDS	Human Immunodeficiency Virus & Acquired Immunodeficiency Syndrome
IASC	Inter-Agency Standing Committee
ID	Identity Card
IDP	Internally Displaced Persons
IEC	Information Education and Communication
IPF	Investment Project Financing
IPV	Intimate Partner Violence
LMP	Labor Management Procedure
M&E	Monitoring and Evaluation (M&E)
MOI	FMS Ministry of Interior
MOIFAR	Ministry of Interior, Federal Affairs and Reconciliation
MOLSA	Federal Ministry of Labor and Social Affairs
NDP	National Development Plans
NDP	National Decentralization Policy
NLGI	National Local Government Institute
NGOs,	Non-Governmental Organizations
NPSC	National Program Steering Committee
NTWG	National Technical Working Group
OHS	Occupational Health and Safety (OHS) hazards
PAD	Project Appraisal Document
NPC	National Programme Coordinator
Secretariat	Project Implementation Unit at FGS and FMS levels
NS	National Secretariat
SS	State Secretariat
PM	Programme Manager
PSEA	Principles of Sexual Exploitations and Abuse
PWD	Persons with disabilities
RCRF	Recurrent Costs and Reform Financing

SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEP	Stakeholder Engagement Plan
SGBV	Sexual and Gender Based Violence
SPDS	Standard Procurement Documents
SRCP	Somalia Crisis Recovery Project
SURP	Somalia Urban Resilience Project
TA	Technical Assistance
UN JPLG	United Nations Joint Programme on Local Governance
UN	United Nations
USAID SHIR	USAID Somalis Harmonizing Inter-and Intra-Communal Relationships k
VDC	Village Development Committees
WB	World Bank

1. Introduction

1. The Federal Government of Somalia (FGS) with the support of the World Bank (WB) are preparing the BUSLHO program to strengthen community and local institutions for social cohesion, inclusion and resilience. The program will support decentralization and expanding state reach by strengthening district and community institutions as well as coordination with and by FMS and FGS; it will situate itself in the stabilization continuum by supporting process legitimacy through inclusive and participatory governance and support trust and social cohesion by incentivizing collaborative action within and amongst communities and between communities and the state. It is a 10-year program (2025-2030), focuses on extending local governance and services to hard-to-reach and rural areas, and seeks to build trust and legitimacy by focusing on process—or how services are delivered—while contributing to progress on service delivery outcomes.

Empirical evidence indicates that Gender Based Violence (GBV) is common in the lives of Somali women and girls across their lifespans, with particular forms of GBV including Female Genital Mutilation or Cutting (FGM/C), child marriage and Intimate Partner Violence (IPV) being endemic. Other normative forms of GBV in Somalia include cultural practices of abduction, forced marriage and widow inheritance. The extent to which each type of GBV is prevalent varies across regions¹. Besides the existing contextual risk, preliminary assessment of the project's GBV related risks, in particular, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) is rated High (see Annex 5). Some of the factors contributing to this rating include the high prevalence of SEA/SH and other forms of Gender-Based Violence (GBV) in districts/communities where project activities are likely to be implemented as a result of high insecurity, cultural norms, high levels of poverty and marginalization, severe spells of drought and famine among others. Project related triggers of GBV SEA/SH risks include community interaction with project workers and or sexual harassment amongst project workers, particularly as part of recruitment and retention efforts for workers hired under the project. The risk is further amplified by the low capacity and limited experience of the MOIFAR in the application of the WB's ESF for managing Environmental and Social (E&S) risk and impacts.

2. In this context, and as guided by the WB Guidance Note, the preparation of a SEA/SH Prevention and Response Action Plan (SEA/SH Action Plan) outlining material measures to mitigate SEA/SH risks is therefore a requirement for the proposed project. This SEA/SH-PRP is therefore developed by FGS as one of the Environmental and Social (E&S) instruments required to address and manage E&S impacts associated with the BULSHO project under the World Bank's Environmental and Social Framework (ESF). This SEA/SH-PRP outlines operational procedures and protocols to be deployed over the project life to prevent, mitigate and respond to all forms of project-related GBV SEA/SH risks. These operational procedures and protocols provided guidance on how to: i) address GBV SEA/SH allegations that may arise; ii) prevent and respond to SEA/SH concerns; iii) identify and investigate SEA/SH allegations, , and iv) define and action disciplinary measures for violation of Code of Conduct (CoC) by BULSHO workers

3. The SEA/SH- Action Plan is a living document and may be revised as the project advances. The Labor Management Procedure (LMP) developed for the proposed project also provides for a worker mechanism for confidential reporting of complaints relating to SEA/SH.

1.1 Program Objectives

4. The main objective of the BULSHO program is to strengthen community and local institutions for improved social cohesion, inclusion and resilience

1.2 Program Structure

5. The BULSHO program will be delivered through four (4) interrelated components with related activities as outlined under Table 1 below.

¹ Norwegian Country of Origin Information Centre (2018) Somalia: Marriage and divorce, Land info, Oslo.

Table 1: The structure of the proposed BULSHO Project

Component	Key Activities
Component 1: Community and District Social and Institutional Strengthening.	<p>This component will finance the BULSHO program's institutional strengthening activities under the three district support packages. This includes:</p> <ul style="list-style-type: none"> ○ Foundational institutional strengthening for districts with minimal state presence under Package #1 (of which there are approximately 29 districts across Somalia; ○ Enhanced institutional strengthening for districts that have emerged from early phase stabilization support and/or established an interim or permanent state administration but are fragile and possesses limited capacity for community engagement, planning and service delivery under Package #2 (of which there are approximately 90 districts), and ○ Advanced institutional strengthening for districts that have established district councils and are capable of varying degrees of resource mobilization, coordination and service delivery (of which there are approximately 37 districts). <p>Thus, this component will finance technical assistance to recognize inclusive community institutions and establish interim or permanent district administrations, foundational reconciliation and social healing activities, and awareness raising activities on the BULSHO program's principles, pathways and support packages.</p>
Component 2: Local Social Contract Platform.	<p>This component will scale up and support the institutionalization of district development planning piloted under programs such as JPLG and PCG through financing the BULSHO program's local social contract platform under the program's Support Package #2 and #3. It will support each district to establish the BULSHO local social contract platform consisting of</p> <ol style="list-style-type: none"> a. community diagnostic and collaboration forums in each community (including of climate and disaster risks), b. participatory planning systems, c. resource mobilization and budgeting systems, d. community oversight and accountability systems, and e. Citizen charters between citizens and the government that would encompass commitments to provide and/or facilitate the provision of basic services (i.e. via private or humanitarian actors) based on community prioritization, commitments on process (e.g., participation, transparency, grievance handling) as well as citizen commitments on process and contributions. <p>The objective is to create a platform for government, development partner programs and World Bank-financed projects to systematically engage communities and citizens in a coordinated joined up fashion. The component would thus finance capacity building, collective action allowances for select marginalized and/or disempowered groups (e.g., women, youth, IDPs), and access to Sokaab-like crowdfunding platforms and other participatory and social accountability tools. While BULSHO will finance a few of the identified priorities in eligible districts - there will be deliberate efforts to ensure the plans are broad covering multiple sectors and not limited to BULSHO anchor financing. To avoid consultation fatigue, FMSs and Districts will need to engage and build buy-in from ongoing projects so they can support some of the priorities.</p>
Component 3: Matching Grants for Social Cohesion,	<p>This component will:</p> <ol style="list-style-type: none"> f. Finance the BULSHO program's matching grants to the districts that graduate and/or meet the minimum participating conditions for Support Package #3. The matching grants would finance community priorities arising

Inclusion and Resilience.	<p>from the social contract platform and will include social and economic infrastructure or livelihoods initiatives, including investments that mitigate climate risks. Furthermore, it is envisioned that over the life of the BULSHO program, and as additional financing becomes available, more districts receiving support packages #1 and #2 under components 1 and 2, respectively, will graduate and thus meet the minimum participating conditions for accessing the matching grants.</p> <p>Building on the lessons of the DIALOGUE project--which successfully used matching grants to incentive cross-community collaboration and build citizen-state trust--the component will incentivize communities to mobilize and pool resources with other communities and government authorities with the aim of increasing the building blocks of social cohesion (shared purpose, trust and willingness to cooperate) across communities as well as trust between citizen and state.</p>
Component 4: Capacity Building for Coordination, Delivery, Innovation and Learning.	<p>This component will finance:</p> <ul style="list-style-type: none"> Operational and technical capacity building of the Ministry of Interior, Federal Affairs and Reconciliation (MoIFAR) to review, develop and/or cascade policy, legislations, regulations and guidelines needed to achieve the BULSHO program objectives thereby establishing clear “rules of the game” and embedding them in the local policy framework, to augment the capacity of MoIFAR to deliver technical support and backstopping to FMS in relation to components 1-3, to comply with World Bank guidelines and requirements, to coordinate between and across government and with development partners, to monitor results and report progress, and to document and disseminate innovation and lessons including lessons from other development partner initiatives.

1.3 Key Outputs

- Social commitments and citizen charters signed.
- Social, technical and administrative training and support delivered to district officials and community leaders.
- Platforms and tools for resource mobilization, investment tracking, and social accountability established and executed.
- Resources from communities, local government, private sector, diaspora and development partners mobilized.
- Inter-governmental conditional grant mechanism operationalized.
- FMS and FGS technical, fiduciary and E&S staffing capacity enhanced.

1.4 Implementing Institutions

6. The FGS Ministry of Interior, Federal Affairs and Reconciliation (MoIFAR) will be the lead implementing agency. At FMS-level, the Ministries of Interior will lead the implementation, working with relevant sector ministries. As BULSHO, is focused on building long-term country capacity, the institutional arrangements will favor the use of government staff where possible.

1.5 Beneficiaries

7. The main beneficiary categories and overall estimates of beneficiaries reached are three-fold:
- Individuals: Approximately 1.9M residents (50% of women) of twenty target districts will directly and indirectly benefit from the project through increased access to services. Approximately 1,000 district officials and staff (25% of women) will benefit from the project through training and increased knowledge on management, planning & budgeting, PMF, M&E etc. Approximately 50,000 community representatives (30% of women) will benefit from the project through increased agency and participation in decision making.

- Communities: Approximately 1,000 villages (or cluster of villages) will benefit from the project through increased capacity to identify opportunities, collaborate, and implement small scale investment.
- District Governments: 45 district governments in total will benefit from the project through increased capacity to plan, budget for and execute local investments, raise and manage financial resources, and deliver services to their population.

1.6 Objective of the SEA/SH-Prevention and Response Plan

8. The overall objective of the GBV SEA/SH Prevention and Response Plan also referred to as the GBV SEA/SH Action Plan is to provide tools and frameworks that will support the BULSHO Project Implementation Units (Secretariats) at FGS and FMS levels in preventing and responding to the Project-induced SEA/SH and other GBV risks.

1.7 Approach and Methodology

9. The plan was prepared using the methodology below:
- Literature review of World Bank guidelines, global and national laws and policies on GBV SEA/SH.
 - Identification of potential project-induced GBV SEA/SH risks related to BULSHO interventions.
 - Development of possible mitigation measures, including an assessment and plan for strengthening the capacity of project workers to be engaged under the BULSHO.
 - Identification of key actions to be taken, institutions responsible and time frames for the implementation of each of the identified mitigation measures.

1.8. World Bank Guidance

10. The WB Guidance Note² defines four key areas of GBV risks (listed below) that can arise in the context of Investment Project Financings (IPFs) involving major civil works. However, SEA and workplace SH are the types of GBV that are the most likely to occur in or be exacerbated by WB-financed projects. This SEA/SH Action Plan focuses on how to address project related SEA/SH risks :

- a. SEA - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion.
- b. Workplace sexual harassment - unwanted sexual advances; requests for sexual favors, sexual physical contact.

11. In response to the potential risks implied in the discussion of the concepts above, the BULSHO project will establish and implement a SEA/SH Action Plan. The plan details the operational measures that will be put in place to mitigate the risks of SEA/SH that are project-related, including ensuring that project-established Grievance Mechanisms (GMs) are in place to receive reports and refer survivors safely and confidentially for further support.

2. LEGAL FRAMEWORK AND GAP RELATED TO SEA/SH AND GBV

12. Rooted in their unique cultural and religious backgrounds in Somalia, large differences exist among and between Somali communities and international frameworks on the understanding and perception of Gender Based Violence (GBV). While, by international standards, the notion of GBV is firmly embedded within the international human rights and gender equality frameworks, in Somalia, the legal understanding of GBV is located at the intersection of the three dimensions of the legal system in force in the country, namely, statutory, customary and Sharia. In Somalia, the words that form GBV are Western-coined words that were introduced literally into the Somali language. In the Somali language, GBV is said as: '*Xadgudubyo ku Saleeysan Galmada iyo Jinsiga*', which means 'violation based on sex and gender'. However, the popularly used Somali translation is '*Xadgub Jinsiyeed*', which is a shortened

² World Bank (2018). Good Practice Note – Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, 28 September 2018, page 3.

version to mean simply 'gender violation'. For cultural and religious reasons, the word *sexual* disappears, as it would spark confrontation in society.

2.1 Somalia Context

13. The Somali legal system comprises of statutory law, customary law (Xeer) and Sharia law. Although Sharia law is not applied in statutory courts, it is integrated into customary law wherein it is not adhered to strictly. While formal laws define crimes and punishment, their application is continuously negotiated through the customary power dynamics and their upholders. In practice, the primacy of Xeer is accepted and is the most accessible, used and preferred system for dispute resolution. The state also perpetuates the Xeer supremacy when its' officers - police, prosecutors and judges - refer cases back to clan elders, who still remain the most powerful upholding force behind justice and access to it. The Xeer is encompassed of clan leaders or elders, selected for their assumed wisdom, courage, experience and knowledge to arbitrate disputes and deliver verdicts.

2.2 Somalia Legal Context

14. **The Constitution of Somalia:** The legal foundation for the management of environment and social affairs in Somalia is the country's constitution. Specifically, the articles of the constitution relevant to GBV SEA/SH include Article 10 ("Human Dignity"), Article 11 ("Equity"), Article 15 ("Liberty and Security"), Article 27 ("Economic and Social Rights"), Article 29 ("Children"), Article 34 ("Access to Justice"), Article 39 ("Redress for Violations of Human Rights").

- **Article 10 ("Human Dignity")** stipulates that (1) All citizens, regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law; (2) Discrimination is deemed to occur if the effect of an action impairs or restricts a person's rights, even if the actor did not intend this effect; (3) The State must not discriminate against any person on the basis of age, race, color, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth; (4) All State programs, such as laws, or political and administrative actions that are designed to achieve full equality for individuals or groups who are disadvantaged, or who have suffered from discrimination in the past, shall be deemed to be not discriminatory.
- **Article 11 ("Equity")** stipulates that (1) All citizens, regardless of sex, religion, social or economic status, political opinion, clan, disability, occupation, birth or dialect shall have equal rights and duties before the law; (2) Discrimination is deemed to occur if the effect of an action impairs or restricts a person's rights, even if the actor did not intend this effect; (3) The State must not discriminate against any person on the basis of age, race, color, tribe, ethnicity, culture, dialect, gender, birth, disability, religion, political opinion, occupation, or wealth; (4) All State programs, such as laws, or political and administrative actions that are designed to achieve full equality for individuals or groups who are disadvantaged, or who have suffered from discrimination in the past, shall be deemed to be not discriminatory.
- **Article 15** protects liberty and security of the person, including freedom from all violence against women, including Female Genital Mutilation (FGM), which is explicitly prohibited
- **Article 27:** protects social and economic rights.
- **Articles 34 and 39** guarantee access to courts and redress for violations of human rights.
- **The 1962 Penal Code** is still current law in the legislation that addresses GBV. It criminalizes rape (Article 298) and other forms of sexual violence, such as sexual exploitation and abuse and sexual harassment as well as forced prostitution (Article 408). Articles 398–9 provide that 'carnal intercourse' and 'acts of lust committed with violence' are punishable with 5–15 years' and 1–5 years' imprisonment respectively. However, the crimes are too narrowly defined in accordance

with international law standards of protection from GBV. Furthermore, the legislation contains no age of consent. This omission leaves children particularly vulnerable to abuse.

- The House of Representatives in September 2020 passed the Rape, Fornication and other Related **Offences Bill- Law No. 78/2020**. Article 11 of the Act addresses Sexual Harassment and Assault, providing that “Any mature and mentally sane individual who inappropriately touches a person other than their spouse, or compels a person to touch him/her inappropriately, or forces a person to touch another person inappropriately, has committed a criminal act of unwelcome sexual advances and inappropriate touching and is liable to a penalty of 1-3 years of imprisonment. If the criminal act stated in Paragraph 1 of this Article, is committed against a minor, or a vulnerable person, the offender will be liable to 3-5 years of imprisonment”. The law does not provide any details on legal age of a minor in Somalia or sex consent. However, according to the Family Code (1975), the legal age for marriage in Somalia is 18 for both men and women.

2.3 International Conventions and Agreements Signed or Ratified by Somalia

15. There are a number of international treaties, agreements and conventions that had been signed or ratified by Somalia. International environment, social and cultural conventions, agreements, treaties ratified by Somalia which are relevant to GBV/SEA/SH are listed below:

- The recently ratified Convention on the Rights of the Child (CRC) in January 2015;
- The International Convention on the Elimination of All Forms of Racial Discrimination in 1975, and
- The African [Banjul] Charter of Human Rights in 1985 and 1986.

16. Somalia is yet to sign or ratify many of the international instruments that are derived from the universal human rights that define GBV, including Convention for Elimination of Discrimination against Women (CEDAW) and the Protocol to the African Charter on Human Rights and Peoples’ Rights on the Rights of Women in Africa.

2.4. The WB Good Practice Note

17. The WB Good Practice Note⁴ (GPN) provides a comprehensive understanding of the nature and kinds of GBV that projects funded by the Bank may exacerbate. The GPN establishes an approach to identifying GBV risks, particularly SEA/SH 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.

18. The GPN provides tailored information and tools to: a) understand GBV risks and considerations in infrastructure projects; b) mechanisms for addressing GBV risks and capacities to respond using the Bank’s GBV Risk Assessment Tool; c) mechanisms for addressing GBV risks in design and implementation phases including during bid processes, codes of conduct with contractors and laborers; d) safeguards to collect and respond to GBV SEA/SH including a GM, consultations and responding to GBV incidents, and e) suggestions for improving safety of, and consultations with, women and girls throughout the project. Key Principles of GPN are summarized below.

- **Reduce labor influx by tapping into the local workforce.** Depending on the size and 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) 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 Environmental and Social Management Plan (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 noncompliance.

3. Potential SEA/SH Risks in BULSHO

3.1. Somalia Country SEA/SH Risk Profile

19. Conflict in Somalia has given rise to new expressions of GBV in recent decades, in particular Conflict-Related Sexual Violence (CRSV), with both state and non-state actors implicated in perpetration. Sexual violence has been deployed as a conflict strategy by armed actors to punish, humiliate and displace populations, and through forced marriages based on family, clan or political affiliation, to control women's fertility and reproductive capacities. Women and girls have also been exposed to sexual violence indirectly through conflict, opportunistic sexual assault by authorities, smugglers and traffickers, with displaced women and girls used as 'payment' for safe passage at checkpoints³. The surge in sexual assault since the onset of civil war in 1991-92 has been described as 'shocking' for Somali culture. On a positive note, the recent post-conflict period has seen a reduction in the incidence of conflict-related rape and sexual assault in Mogadishu following the withdrawal of clan militias.⁴

20. The impacts of GBV are long-lasting and severe, resulting not only in physical and mental health problems that can last a lifetime for the individuals experiencing it, but also, creating a considerable economic burden for households, communities and countries. GBV can affect women's contribution to household income, result in high costs for social services required by survivors, affect children's development prospects. Further, GBV may potentially adversely affect a country's economic growth as well as feed the intergenerational transmission of violence, as experiencing one type of violence may increase the likelihood of perpetrating or becoming a survivor of another type of violence later in life⁵.

21. It is common knowledge that development operations have the potential to increase or introduce new GBV SEA/SH risks. In the case of the BULSHO, preliminary assessment of the project-related risks of GBV and, in particular SEA/SH is High. This is because project activities are likely to be implemented in districts/communities where SEA/SH and other forms of GBV, such as Intimate Partner Violence (IPV), are prevalent as a result of high insecurity, cultural norms, high levels of poverty and marginalization, severe spells of drought and famine, unemployment, low levels of literacy and project investments rolled out in a context of limited resources against widespread need. SEA/SH risks are likely to be exacerbated by the project due to the influx of workers engaged to undertake social and economic infrastructure financed under component 3 of the program. The increased community interaction with project workers is likely to increase the risk of SEA/SH. Further SEA/SH risks are anticipated as part of recruitment and retention efforts for workers to be hired under the project. Project interventions such as matching grants that is expected to finance livelihoods initiatives may alter power dynamics at home potentially leading to domestic violence/Intimate Partner Violence.

22. It is therefore important to Identify and understand both project-related and existing contextual risks linked to GBV and particularly SEA/SH so as to ensure that WB-supported projects do not contribute to or exacerbate existing vulnerabilities such as inter clan conflicts that fuel displacement, high levels of poverty, unemployment and insecurity and discrimination of minority clans and or ethnic groups in access to services and participation in social economic activities. This should be accompanied by decisive action to develop appropriate prevention and mitigation measures integrated into project design and to

³ Musse 2004.

⁴ ¹³International Alert/CISP (2015). "The Complexity of Sexual and Gender-Based Violence: Insights from Mogadishu and South-Central Somalia."

⁵ SEA/SH PRP for Somalia Sustainable Fisheries and Blue Economy Development Project -BADMAAL (P178032)

be monitored throughout project implementation. Key measures, including response to allegations should be survivor-centred (ensuring survivors' confidentiality and rights to informed choices) and focused on protection and prevention of GBV, SEA/SH and child protection risks. Protection and prevention efforts should be based on active participation of affected groups in the design and implementation of actions to ensure that activities are fully informed.

3.2 Screening for SEA/SH Risks under the BULSHO Project

23. Development projects may aggravate GBV SEA/SH risks existing within communities and among project workers and for this reason, as part of the Environmental and Social (E&S) risk assessment process, projects need to be reviewed to identify potential SEA/SH risks and impacts and put in place appropriate mitigation measures as early as possible. Preliminary assessment of the BULSHO project revealed the potential for GBV related risks and, in particular, SEA and SH leading to the high-risk rating. The substantial GBV/SEA/SH risk in the project is primarily due to:

- Project activities will likely be implemented in districts/communities where SEA/SH and other forms of Gender-Based Violence (GBV), such as IPV are prevalent as a result of high insecurity, cultural norms, high levels of poverty and marginalization, severe spells of drought and famine, unemployment, low levels of literacy and project investments rolled out in a context of limited resources against widespread need. Project-related risks relate to limitations on the mobility of women and girls and potential insecurity that may extend from movement, especially in the newly liberated areas/fragile districts and communities with minimal state presence, and the increased risk of exploitation and harm from armed groups/forces/individuals.
- Influx of transient male workers into small and often rural host communities with low capacity to absorb the sudden increase of workers, this might apply under the planned civil works activities including construction, renovation and rehabilitation of social economic infrastructure to be financed under component 3 of the project. Project workers may pose a risk to vulnerable groups like poor and unemployed local women, children, or youths, who might be more susceptible to exploitation or abuse due to their dependence on the project for income or services.
- Abuse of power by officials or project workers exploiting their position leading to SEA during service delivery or resource distribution. Also, when women and marginalized groups seek access to mobilized resources may be exposed to risks of SEA particularly if there are gatekeepers who demand sexual favors in exchange for project benefits etc.
- Limited capacity for community engagement may exclude women, children or minority groups from participating in planning and decision-making process therefore reinforcing existing inequalities. Scarce resources or services may lead to tensions within the communities thus disproportionately affecting women and marginalized groups who often have less access to economic opportunities or social capital which can exacerbate GBV risks related to economic dependency or survival.
- Female project workers or women and marginalized individuals involved in the oversights may face harassment, threats or even violence for exposing misconduct etc.
- Presence of security personnel, who may be engaged to provide protection but can also abuse their positions of power and status to perpetrate GBV SEA/SH risks.
- Male workers transporting construction goods for the planned social economic infrastructure initiatives (for example, truck drivers), who can perpetrate GBV SEA/SH risks on routes and at truck stops associated with the project, even if not on the project site. Temporal workers who might be more vulnerable to GBV SEA/SH risks due to short duration contracts or that potential perpetrators may go unidentified due to lack of background checks.
- Community interaction with project workers can exacerbate SEA risks and SH risks amongst project workers, particularly as part of recruitment and retention efforts for workers hired under the project.

24. The project has been screened for SEA/SH risks using the standard WB Tool and rated as High. Some of the main risks identified include:

- High prevalence of various forms of GBV including IPV, rape, child marriage, domestic violence and marital rape, wife beating among others within the project
- The proposed project will be implemented in a fragile, conflict or violence affected (FCV) country hence presenting further risks of exacerbating GBV.
- Limited enforcement of some of the existing laws addressing GBV risks due to FCV context.
- Limited client capacity for managing E&S risks including those related to GBV.
- Project activities likely to be implemented in areas where the client has low capacity for monitoring E&S risks.

25. Projects such as BULSHO are likely to change power structures and relations (including gender relations)) in communities, as a results of interventions such as the matching grants to finance livelihood initiatives, the employment opportunities and other benefits from the project interventions etc. may place women, girls, and boys in situations where they may be exposed to SEA/SH. Therefore, it is imperative for BULSHO to proactively plan to mitigate against SEA/SH risks that may emerge in project sites as a result of BULSHO interventions. Other factors that lead to vulnerability of women and girls to SEA/SH in the project areas include:

- i. *Power asymmetry*: that exist in the backdrop of poverty and unemployment among rural communities in Somalia can be abused easily resulting in women and girls to suffer from SEA/SH risks. Contractors often exploit the power asymmetry for personal gain and hence engage in SEA/SH.
- ii. *Poverty and Inequality*: widespread poverty and inequality that invariably leads to desperation and a situation where some women and girls may be vulnerable to SEA/SH during their interaction with project staff who share benefits such as employment, training opportunities etc. The high poverty levels amongst communities in Somalia exacerbates vulnerability to SEA/SH risks.
- iii. *Societal norms*. Women and girls are at usually high risk of SEA/SH because of *societal norms* that perpetuate power differentials between males and females, and support or condone males' violence against women and girls.
- iv. *Limited labor influx* and the extent to which a community has capacity to absorb labor influx, as well as the inflow of income to workers, can exacerbate already existing inequities between workers and community members.
- v. *Low levels of education and literacy*: among girls, that leads to high unemployment rates among women. These factors weaken women's and girls' confidence as they seek menial jobs in construction sites. Further, women and girls are at risk of SEA/SH from construction workers who often have higher incomes than usually available to community members.

4. Stakeholder Consultation on Existing GBV SEA/SH RISKS and Management Approaches

26. Consultations on existing and potential GBV SEA/SH risks were held with various stakeholders comprising, Government entities, municipality officials, youth, civil society media and women, community organizations, and Persons with disabilities (PWDs). The consultations took place on 13th January 2025 in Jubbaland and, 16th - 20th January 2025 in the remaining states of Puntland, Galmudug and Hirshabelle (more details are presented in Annex 4). Some of the key findings include:

- Forms of GBV experienced at the community level include domestic violence, early marriage, and workplace Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA) that can occur in humanitarian settings, where vulnerable populations may be exploited by aid workers or community leaders. Other forms include rape, domestic abuse, trafficking of women, girls, and boys, along with detrimental traditional practices such as female genital mutilation/cutting, and bride inheritance, among others.
- Physical, emotional, and psychological abuse within households is common and often normalized by cultural practices.

- Rape and sexual assault, which can occur in both public and private settings with women and girls being particularly vulnerable.
- Early and forced marriages where young girls may be married off at a young age, often against their will, leading to various forms of abuse.
- Female Genital Mutilation (FGM) practiced in some communities is a harmful traditional practice that poses serious health risks and violates the rights of women and girls.
- All the above forms of GBV, are managed through dialogue and negotiation led by clan and or religious leaders.

Challenges

- There are limited formal and dedicated mechanisms for addressing GBV SEA/SH within communities, with most cases being handled informally by clan/village/community elders and religious leaders. With the existing gap in formal management of grievances related to GBV SEA/SH, the project team needs to take appropriate measures to address it.
- There are a few Non-Governmental Organizations (NGOs) such as ALIGHT, former American Refugee Committee (ARC) and Save the Children who work with the Ministry of Gender that offer such services but have low capacity in terms of technical competence and limited outreach due to inadequate resourcing.
- The activities of these NGOs on GBV SEA/SH aspects are not fully integrated with municipal programs. They work independently and rarely share information and data with municipality officials or even government entities and this issue needs to be address for the project to be effective in managing GBV SEA/SH complaints.

Recommendations:

The stakeholders urged the project team to:

- Leverage on the ongoing efforts to address GBV SEA/SH risks (highlighted above) by partnering with NGOs active in the GBV management space, in conducting community awareness campaigns, training of project staff on handling GBV SEA/SH related complaints and also during establishment of specific grievance mechanism for safe reporting and handling of GBV SEA/SH complaints.
- Enhance support for a multispectral strategy to aid survivors of GBV, highlighting the necessity of integrating sexual and reproductive health services with GBV services. Additionally, there is need to establish pooled funding mechanism designed to meet urgent GBV needs and services in remote regions, which should include mental health and psychosocial Support Services, protection and safe spaces for women, girls, and boys.
- Establish a dedicated GBV response units at FGS, FMS and Municipal level mostly with women employees, establishing safe spaces for survivors, and launching awareness campaigns and more sensitization programs. Where feasible special laws focusing on addressing GBV SEA/SH to be enacted with heavy punishments to stop it.
- Develop clear procedures and protocol for prevention, reporting, and response for GBV SEA/SH.
- Set up confidential and accessible reporting channels including hotlines, suggestion boxes, and implement community awareness campaigns to educate the public about SEA/SH and GBV, their effects, and the importance of reporting incidents.
- Conduct regular training sessions for staff, community leaders, and volunteers on identifying, preventing, and responding to SEA/SH and GBV.
- Involve local leaders and influencers to change cultural attitudes and norms that condone violence.
- Foster collaboration between governmental bodies, NGOs, and community organizations to create a unified response to SEA/SH and GBV. Involve men and boys in advocacy and prevention efforts to promote gender equality.

5. Prevention and Responding to SEA/SH Risks under BULSHO

27. The project will adopt the following measures to prevent and address potential SEA/SH risks associated with BUSLHO project.

- a. **Train all project staff including direct workers, partners, sub-contractors, suppliers and those appointed as SEA/SH focal points on Code of Conduct (CoC), GBV SEA/SH and child protection risk issues** as part of their induction as well as throughout the course of employment. All categories of workers will sign and be sensitized on the CoC. Similarly, the FGS and FMS Secretariats will ensure that all contractors, suppliers, Non-Governmental Organizations (NGOs) and other implementing partners' workers have been sensitized on the CoC prior to signing it.
- b. **Undertake regular community consultations to raise awareness on the risk of GBV SEA/SH and appropriate measures for reporting and response:** Community awareness on GBV SEA/SH, with specific focus on women, adolescents and children. Project beneficiaries will be made aware of the laws and services that can protect them and provide redress in case of a GBV SEA/SH incidents. CoCs will be made available to the public in the project areas, as a strategy to raise awareness of expected behavior of any project-related worker and mechanisms for reporting should those workers be in breach of the CoC. A guideline for handling GBV SEA/SH related grievances including the GM protocol for SEA/SH complaint is provided under section 5 while the related complaints registration, log and reporting templates are provided under Annex 2, 3 and 4. A sample CoC for project workers is provided under Annex 1.
- c. **Adopt the Core Principles of the Inter Agency Standing Committee (IASC) Task Force and World Bank Action Plan on Principles of Sexual Exploitations and Abuse (PSEA)**⁶. All categories of workers will be inducted and will sign a Code of Conduct (CoC), which includes expected standards of behavior regarding GBV SEA/SH according to the World Bank's 2017 Standard Procurement Documents (SPDs). The Secretariat will further ensure that all contractors, suppliers, and other implementing partners' workers have been inducted and have signed a CoC.
- d. **Map out quality GBV service providers and identify dedicated referral process at the FGS and FMS level for timely referral of GBV survivors.** The list of service providers will be mapped out before the commencement of any project activities. Further, the project will leverage on existing GBV SEA/SH risk management systems available for other WB financed projects.
- e. **Engage a GBV Specialist to support the project implementation: The FGS Secretariat will recruit a GBV specialist** to support the management of the SEA/SH risks in the project.
- f. **Establish SEA/SH responsive GM that enables safe and confidential reporting of incidences of SEA/SH.** The Project will have a SEA/SH GM (Section 5) that is aligned to the one described in the Stakeholder Engagement Plan (SEP). Complaints related to SEA/SH will be reported through the main channels of the general Project GM. However, given the sensitive nature of issues related to GBV, the GM will include multiple channels to enable safe, confidential reporting of GBV-related complaints, particularly as linked to SEA/SH. Such channels will include a dedicated phone number and/ or email, community focal points with experience in handling SEA/SH concerns, project appointed SEA/SH focal points, relevant local partner organizations,. Pending informed consent from survivors, complaints received through such mechanisms will be channeled into the main GM systems and the only information to be collected from the person reporting will include:
 - Demographic data, such as age and gender;
 - The nature of the complaint (what the complainant says in his/ her own words);
 - Whether the complainant believes the perpetrator was related to the project; and whether they received or were offered referral to services;
 - A survivor-centric approach will be applied in handling GBV grievances and survivors.

⁶ 15IASC (2002). "Six Core Principles for Relating to Sexual Exploitation and Abuse", accessed at: <https://interagencystandingcommittee.org/principals/documents-public/iasc-six-core-principles-relating-sexualexploitation-and-abuse-2002>

- g. **Sign and enforce worker codes of conduct for project staff/contractor as well as** conducting regular safety mapping to identify areas where women and girls feel unsafe and develop remedial actions where necessary. The Secretariat will be responsible for enforcement of SEA/ SH requirements and expectations in contractual obligations and the CoCs.
- h. **Conduct GBV risk assessments at project sites: GBV risk assessments will be done using the** safety audits methodology before commencement of the project. The scope of the audit will form part of GBV risk assessment and will include:
 - Conducting requisite Sexual and Gender Based Violence (SGBV) trainings to the Secretariat staff, contractor, contractor's staff and workers, service providers, local communities living near project sites and any other identified individuals or groups that may be affected.
 - Reviewing the adequacy of existing Contractor's SGBV policies.
 - Developing GBV Framework including Reporting and Investigation procedures.
 - Implementing the measures outlined in the SEA/SH prevention and response Action Plan.
- i. **Establish a GBV SEA/SH reporting protocol to ensure timely and safe reporting of SEA/SH** incidences. Target communities should be informed of the availability of the various channels for reporting GBV SEA/SH allegations. This will be made explicit in all community awareness sessions, as well as be made part of the publicly disclosed information. The FGS Social Safeguard/GBV specialist will be responsible for establishing a reporting protocol for the BULSHO under the supervision of the FGS Project Coordinator..
- j. **Monitor Evaluate and Report.** It is essential that the Secretariats monitor SEA/SH prevention and response Action Plan activities especially the GBV Specialist, M&E Specialist, Procurement and Social Safeguard specialists. Monitoring and Evaluation will play a key role in assessing the effectiveness of mitigation measures. As part of the M&E process, indicators need to be selected for inclusion and reporting in the project reports. The project reports should include indicators related to the SEA/ SH Action Plan activities on the project and the GM.
- k. **The performance indicators for the GBV SEA/SH risk mitigation are:**
 - Successful implementation of agreed GBV SEA/SH Prevention and Response Action Plan;
 - Number of training courses related to GBV SEA/SH delivered;
 - Percentage of workers that have signed a CoC;
 - Percentage of workers that have attended the CoC training;
 - Number of GBV SEA/SH cases reported to the GM (disaggregated by survivor age and sex and type of incident reported);
 - Percentage (%) of GBV SEA/SH cases closed within the delays defined in the project GBV SEA/SH Action Plan (disaggregated by outcome of the verification process);
 - Percentage (%) of survivors reporting project-related incidents who were referred to case management services (disaggregated by type of service).

6. SEA/SH Action Plan

28. A summary of the SEA/SH Action Plan is presented in Table 3. The FGS Secretariat will engage a Social /GBV Specialists to coordinate and ensure fidelity of the implementation of this plan and also undertake sensitization of all project structures on SEA/SH. The specialists will also be involved in mainstreaming of the SEA/SH issues into all project activities at the FGS and FMS/District/Community levels.

Table 2 : Prevention and Response Plan for SEA/SH

Object ives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Estimated (US\$)	Budget	
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a	A SEA/SH project-level structure is established at the FGS and FMS level to lead, oversee, and deliver on SEA/SH prevention and response outcomes.	<p>-MOIFAR to ensure that SEA/SH Focal Points at national project level and county level are officially designated.</p> <p>-Train project management team at FGS and FMS staff on SEA/SH.</p> <p>-Mobilize project partners through their E&S Focal Points to be in the lead in SEA/SH risk management for the components they support.</p> <p>-SEA/SH issues are regular agenda items in FGS level project meetings to ensure project success.</p>	At project inception	FGS Secretariat FMS Secretariat	Project Coordinator WB	<ul style="list-style-type: none"> ○ A functional SEA/SH management structure developed and operational at the national and county levels. ○ Partnerships established. ○ Number of project meetings with SEA/SH as an agenda item. ○ No of cases/issues reported and followed up. 	To be done by the GBV and Social Specialists.
b.	Mapping GBV service providers and identification of referral process	<p>-Mapping GBV services for all participating FMSs and project sites.</p> <p>-Identify a dedicated and quality referral services.</p> <p>-Identify GBV services and referral system in place for other World Bank projects in the regions where the projects are to be implemented.</p>	Before start of the BULSHO activities.	GBV Specialist FMS Secretariat and specifically E&S FPs.	FGS Secretariat WB	<p>-SEA/SH Service providers mapping report.</p> <p>-Number/type of GBV/SEA/SH preventive and response services available.</p> <p>-Documented referral process.</p>	To be done by the GBV Specialist.

c	Incorporate GBV SEA/SH requirements and expectations in the standard bidding documents, as well as contractor and consultants' contract.	Ensure that GBV/SEA/SH issues are incorporated in all bidding documents and contracts signed by contractors and consultants.	Before start of the BULSHO activities.	GBV Specialist FMS Secretariat and specifically E&S FPs.	FGS Secretariat WB	GBV SEA/SH standards In procurement and contract document.	To be done by the GBV Specialist.
d	Codes of Conduct signed and understood by project management team, consultants, CSOs/NGOs, service providers and private sector network.	<ul style="list-style-type: none"> -Define the requirements to be included in the CoC which addresses GBV/SEA/SH. -Review CoC for provisions/clauses that guard against GBV/SEA/SH. -Have CoCs signed by all those with physical presence on site. -Train all project-related staff (including temporary and occasional workers) on the behavior obligations under the CoCs. -Display CoC in written word and illustrations at project sites and translated into the local language(s). 	Before start of the BULSHO activities.	GBV Specialist FMS Secretariat and specifically E&S FPs.	FGS Secretariat WB	Percentage of workers that have signed a CoC (target 100 percent).	To be done by the GBV Specialist.
e	Allocation of funds for GBV SEA/SH related costs in procurement Documents.	<ul style="list-style-type: none"> -Clearly define SEA/SH requirements and expectations in the bidding documents. -Evaluate the contractor's SEA/SH Accountability and 	<ul style="list-style-type: none"> -During preparation of bid and Contract documents. -Monitoring on a quarterly basis 	GBV and Social Specialists.	FGS Secretariat WB	<ul style="list-style-type: none"> -Bid documents with clearly defined SEA/SH requirements. -Contract documents with clearly defined SEA/SH clauses/requirements. 	15,000

		<p>Response Framework in the Contractor's Environmental and Social Management Plan (C-ESMP).</p> <p>-Confirm prior to finalizing the contract the contractor's ability to meet the project's GBV SEA/SH prevention and response requirements.</p>					
f	Recruit a GBV specialist at FGS Secretariat to support supervision and implementation of the SEA/SH action plan.	<ul style="list-style-type: none"> Recruitment of a GBV Specialist. 	Within the first 3 months of effectiveness.	FGS Secretariat	FGS Secretariat WB	Recruited qualified and competent staff conversant with GBV/SEA/SH issues.	35,000
g	Build the capacity of BULSHO staff at FGS and FMS level on basic GBV/SEA/SH concepts including on referral pathway, psychological assistance. This should include GBV SEA/SH focal points at FMS level and community, Contractors including security personnel.	<p>-Develop training materials/ content while applying international standards, human rights and survivor-centric approaches.</p> <p>-Undertaking the training for project staff on basic GBV/SEA/SH concepts including on referral pathway, psychological assistance.</p>	<p>-After project effectiveness.</p> <p>-Before activity implementation and a refresher training in the course of project implementation.</p>	GBV and Social Specialists and E&S FPs.	FGS Secretariat WB	Number of trainings conducted for project staff.	20,000
h	Develop M&E programme.	-Develop a comprehensive M&E plan to monitor GBV SEA/SH Action Plan Implementation	-Throughout Project implementation.	GBV specialist-FMS Secretariat and specifically E&S FPs.	FGS Secretariat WB	Developed M&E Framework.	To be done by the GBV Specialist.

		-Monitor GBV action plan					
i	Establish partnerships with key stakeholders (local leaders, service providers, contractors, local CSO's etc.)	-Sensitize project stakeholders on Projects component, activities and related GBV SEA/SH risks. -Conduct stakeholder meetings/FGDs.	Within the first 3 months of project effectiveness and throughout Project implementation.	GBV and Social Specialists and E&S FPs	FGS Secretariat WB	Reports on stakeholder engagement activities including list of participants. Number of key stakeholders engaged.	30,000
j	Develop relevant Information, Education & Communication (IEC) materials for community engagements within the community.	-Develop relevant GBV IEC materials that targets everyone without discrimination and are easy to comprehend. The IEC materials to include information on GBV SEA/SH response services (such as hotline and where to get help).	Within the first 6 months of project effectiveness.	GBV and Social Specialists and E&S FPs.	FGS Secretariat WB	Number and type of GBV SEA/SH IEC material developed.	40,000
k	Enhance the project GM to facilitate safe and confidential reporting and handling of GBV SEA/SH related grievances.	-Identify and integrate GBV SEA/SH reporting points (focal points) and uptake channels within the project GM. -Establish and publicize the protocol and procedure for GBV SEA/SH reporting and management -Develop simple, anonymous and confidential tracking system that BULSHO focal points can use to document GBV	Within the first 6 months of project effectiveness.	GBV and Social Specialists and E&S FPs.	FGS Secretariat WB	-GM with GBV SEA/SH procedure integrated In the project GM. -Variety of reporting channels for GBV SEA/SH identified	10,000

		incidents to service providers.					
l	Identify and train E&S focal points (FPs) at FMS level who will be responsible for GBVSEA/SH grievances on key protocols: referral, reporting and confidentiality.	<ul style="list-style-type: none"> -Nominate E&S (FPs) at the FMS level to manage GBV SEA/SH related complaints. -Train the GBVSEA/SH focal persons and all GM operators on the basic GBV SEA/SH concepts, survivor centric approach and the referral pathways -Review logs for GBV SEA/SH documentation to ensure it follows standards for documenting GBV SEA/SH cases. 	<p>Within the first 6 months of project effectiveness.</p> <p>Before activity implementation and a refresher training in the course of project implementation</p>	FMS Secretariat. GBV and Social Specialists.	FGS Secretariat WB	<p>Nominated E&S FP at FMS level.</p> <p>No of E&S FPs trained on SEA/SH.</p> <p>Updated GBV SEA/SH GM log complying with the GBV SEA/SH documenting protocols.</p>	40,000
m	Community awareness on GBV SEA/SH and disclosure of CoC.	<ul style="list-style-type: none"> -Create and publicize IEC materials on GBV SEA/SH in the local language -Provide safe areas for children and women to disclose disclosure of information on GBV SEA/SH 	Quarterly	GBV and Social Specialists and E&S FPs.	FGS Secretariat WB	Created and disseminated IEC materials that are translated in Somali language.	10,000
n	Communicate GBV/ SEA risks and options for reporting at the community level to create GBV awareness and enable project affected people to file complaints.	-Undertake community awareness campaign son GBV SEA/SH and GM reporting mechanism.	Quarterly.	GBV and Social Specialists and E&S FPs.	FGS Secretariat WB	No of community awareness sessions held including lists of participants.	10,000
o	Assess GBV/ SEA/SH risks in project sites.	-Develop/adaptation of safety audit tools.	Reviewed and updated quarterly.	GBV and Social Specialists and E&S FPs.	FGS Secretariat WB	-Developed GBV SEA/SH audit tools.	30,000

		<ul style="list-style-type: none"> -Conduct periodic safety audits. -Include safety audit recommendations in project sub-components before commencement of the project. 				<ul style="list-style-type: none"> -Reports on conducted GBV SEA/SH safety audits. -Recommendations from the safety audit incorporated into project activities and components. 	
Grand Total				240,000			

6. SEA/SH Grievance Mechanism

29. Complaints related to GBV SEA/SH usually are associated with the risks of stigmatization, rejection and reprisals against survivors which creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Some survivors will choose to seek services directly and never report to the GM, which may lead to a discrepancy in the number of cases reported to the Bank by service providers and the GM operators. For this reason, all World Bank-financed Investment Project Financing (IPF) projects are required to have a Grievance Mechanism (GM) proportionate to the potential risks and impacts of the project

30. Given the project's high SEA/SH risk rating, BULSHO will establish and operate a SEA/SH specific GM with multiple uptake channels to provide women, girls and other at-risk groups such as adolescent, single mothers, a safe and confidential space to log their complaint or concern. The project will also adopt a survivor-centered approach to GBV SEA/SH cases where the survivor's rights, needs and wishes are prioritized in every decision related to the incident. Further, the survivor of SEA/SH will always be treated with dignity and respect while ensuring their safety, wellbeing and any action should always be taken with the survivor's consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.

6.1 Management of GBV SEA/SH reports

31. Preliminary assessment of the project-related GBV SEA and SH risk is high. This is because project activities will likely be implemented in districts/communities where SEA/SH and other forms of GBV, such as Intimate Partner Violence (IPV), are prevalent as a result of high insecurity, cultural norms, high levels of poverty and marginalization, severe spells of drought and famine, unemployment, low levels of literacy and project investments rolled out in a context of limited resources against widespread need.

32. The FGS GBV Specialist will be the main Focal Person (FP) responsible for ensuring GBV related complaints are addressed. The E&S FPs to be appointed by each participating FMS (more details are provided in the SEP) will also serve as the main FPs for handling GBV related grievances at the FMS level. Further, the project will provide various avenues for reporting GBV SEA/SH cases. Such avenues include through the FGS Project Coordinator and the FGS GBV Specialist, FMS Project Manager and E&S FPs staff handling the call centers, or through the GM Hotline Operator dedicated for reporting such complaints. Complaints relating to GBV SEA/SH will be addressed immediately by referring the GBV survivors to support services provided by GBV providers (yet to be identified).

33. Beneficiaries and communities will be encouraged to report all GBV SEA/SH cases through the dedicated GBV SEA/SH referral system and complaints resolution mechanism. This will be made explicit in all community awareness sessions, as well as be part of the publicly disclosed information. Further, all entities reporting on GBV SEA/SH related cases will ensure that reports do not contain identifiable information (including names of survivors, families and perpetrators on the survivor).

34. In line with the survivor-centered approach, the E&S FPs to whom an allegation is disclosed shall provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, compassionate and demonstrating emotional support to the survivor while clarifying relevant information relating to GBV Referral services. It also means respecting confidentiality and the wishes of the survivor. Once a case has been taken in by the E&S FPs, informed consent of the survivor will be obtained to proceed with the case and the case file/information will be submitted to the FGS Social Specialist. The Specialist will first ensure that the survivor has been provided with all necessary GBV referral services and will ensure that the survivor is in safety.

35. In the case, the GBV SEA/SH grievance was allegedly committed by a BULSHO worker, the FGS Project Coordinator is required to alert the WB within 24 hours of any project induced GBV SEA/SH that is reported to the Secretariat/GM at the respective FMS. The kind of information that will be shared include ;

- Type of incidents reported- SEA/SH.
- Age and sex of the survivor whether he/she was a project staff.

- Whether the incident is linked to the project in the survivors' statement.
- Whether the survivor has been offered care (medical, psychosocial support, legal aid, safe shelter etc.)

36. Thereafter, the grievance will be reported to the respective employing agency (relevant department, sub-contractor, Secretariat, government agency). The FGS GBV Specialist will follow up and determine jointly with the E&S FPs of the respective FMS the likelihood that the allegation is related to the BULSHO. The FGS GBV Specialist will follow up and ensure that the violation of the Code of Conduct (CoC) is handled appropriately, e.g. the worker is removed from his or her position and employment is ended (in the case of UN agencies, SEA processes are strictly followed). The responsibility to implement any disciplinary action lies with the employer of the perpetrator, in accordance with local labor legislation, the employment contract, and the CoC. The GBV Specialist will report back to the survivor on any step undertaken and the results.

37. Where the survivor has opted to take a formal legal route with the case, the FGS GBV Specialist will ensure that the survivor has all the support required to file a case at court. It is not however the function of the GBV SEA SH GM to conduct investigations, to make any announcements, or to judge the veracity of an allegation. The GM should refer the case to the national regulatory framework to process the case if the consent of the survivor is received. In line with the survivor-centered approach, no information can be passed on without the consent of the survivor. If the survivor does not wish for the case to be pursued, the survivor shall be offered access to referral services and the grievance recipients will note that the survivor did not wish for the case to be pursued, and the case is considered solved.

38. Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions have been taken against the perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor's consent. If the survivor does not want to launch a complaint with the employer, the case is closed. If the complaint proceeds, the case is reviewed by the FGS GBV Specialist and a course of action is agreed on with the respective IP/employer. The alleged perpetrator's employer takes agreed-on disciplinary action. Once the action is deemed appropriate by the FGS GBV Specialist, the case is recorded as closed.

6.2 World Bank Grievance Mechanisms

39. If an SEA/SH complaint about the project has been raised with the FGS Secretariat GBV Specialist, and no satisfactory response has been received, complaints from workers can be raised with the World Bank Somalia office via email to somaliaalert@worldbank.org

40. **World Bank Washington Office:** If no satisfactory resolution has been received from the World Bank Country office, grievances can be raised with the World Bank Office in Washington. For more information: <http://www.worldbank.org/grs>, email: grievances@worldbank.org

Or

The World Bank
Grievance Redress Service (GRS)
MSN MC 10-1018
1818 H St NW
Washington, DC 20433, USA
Email: grievances@worldbank.org
Fax: +1 202 614 7313

Complaints may be submitted by mail, fax, e-mail, or hand delivery to the World Bank headquarters or any World Bank country office.

41. **World Bank's Inspection Panel:** If not satisfactory solution to the complainants is reached through the GRS, project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance

with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. www.inspectionpanel.org

7. Monitoring and Reporting

42. The FGS GBV Specialist will be the lead responsibility for implementation and monitoring of the LMP in close cooperation with the FGS Project Coordinator. The FGS project Coordinator will allocate the necessary resources for successful implementation of the LMP and ensure that the objectives of the LMP are met. E&S FPs in each participating FMS will report on monthly basis to the FGS GBV Specialist who will in turn report quarterly to World Bank on LMP implementation.

43. FGS GBV Specialist and the E&S FP from each participating FMS will confirm with the Primary suppliers and project contractors that they are meeting child labor, forced labor and safety requirements every 6 months

SEA/SH Action Plan Annexes

Annex 1: SEA/SH Code of Conduct

Annex 2: Proposed Reporting Process and Protocol for receiving Complaint Related to SEA/SH

Annex 3: Sample Mapping of SEA/SH Support Services

Annex 4: Summary report of Stakeholder Consultation and List of Participants

Annex 1: Code of Conduct for Project Workers

Introduction

The Federal Government of Somalia (FGS) with the support of the World Bank (WB) are preparing the BUSLHO program to strengthen community and local institutions for social cohesion, inclusion and resilience. The program will support decentralization and expanding state reach by strengthening district and community institutions as well as coordination with and by FMS and FGS; it will situate itself in the stabilization continuum by supporting process legitimacy through inclusive and participatory governance and support trust and social cohesion by incentivizing collaborative action within and amongst communities and between communities and the state. It is a 10-year program (2025-2030), focuses on extending local governance and services to hard-to-reach and rural areas, and seeks to build trust and legitimacy by focusing on process—or how services are delivered—while contributing to progress on service delivery outcomes.

This Code of Conduct contains essential principles and behavioral rules that are expected to abide by in the daily work of project staff in the office and in the field. The Project staff must comply with this code of conduct and are expected to act in accordance with the Fundamental Principles enshrined within this Code of Conduct at all times

Scope and application

This Code of Conduct applies to all BULSHO Project Staff at all times during their service with the MOIFAR and other Ministries at Federal and State level – both during and after working hours. “Project Staff” in this Code of Conduct refers to all the project employees, consultants, volunteers, interns, and all individuals working under the Federal Government of Somalia and its Member States name and legal status. Staff violating this Code of Conduct are subject to disciplinary measures in accordance with the Disciplinary Measures on the CoC of the civil servant of the Somalia Government, as appropriate.

This Code of Conduct is also valid for all service providers, unless they dispose of their own Code containing all of the same fundamental standards as BULSHO Project Code of Conduct. These rules form an integral part of contracts stipulated with service providers who are therefore required to comply with this Code of Conduct. The violation of this Code of Conduct will result in the immediate termination of all contracts and the discontinuation of the collaboration

Commitment to the tenets of the Code

I, acknowledge that adhering to environmental, social, health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing sexual exploitation and abuse, sexual harassment and other forms of gender-based violence (GBV) and violence against children (VAC) is important. All forms of GBV or VAC are unacceptable in the workplace or when interacting with communities.

General Rules of Conduct

- All Project Staff must comply with criminal and civil laws in force in the Federal Government of Somalia and its Member States.
- The values that are enshrined in the Somalia's constitution, which are fundamental to human rights, protecting dignity of the human person and respect of the rights of all, are the guiding principles of all staff working with or providing services to BULSHO Project.
- Tolerance and understanding are the basic human values that are essential for the work BULSHO Project Staff is undertaking on the ground. All staff must respect all persons equally, without any distinction whatsoever. This respect should foster a climate and a working environment sensitive to the needs of all.
- All Project Staff must apply Code of Conduct both working and non-working hours, abstain from any conduct that they know or appear inappropriate.
- All Project Staff are obliged to comply with all policies and procedures as included in the security guidelines.

Duties and authority

- All Project Staff should fulfil their work duties with integrity and follow working schedules and requirements as per their contract.
- All Project Staff should perform their official duties in a manner that preserves and enhances public confidence in their own integrity and that of the project.
- All Project Staff must carry out their duties efficiently and to the required standards.
- All Project Staff must follow the country guidelines and policy regarding political neutrality and must not allow their own personal or political opinions to interfere with their work.
- Any Project Staff who wishes to stand for public office must inform the Project Management Team and refrain from using project benefits for any political gains.

Respecting the dignity of all

- All Project Staff are expected to respect the dignity of people receiving the project assistance or benefiting from the project both directly and indirectly. In no instance should the need for assistance justify any person being exposed to situations that undermine their dignity, whether they occur during the identification of their needs or risks, or while the services are carried out.

Discrimination, intimidation or violence

- All Project Staff are expected to refrain from any form of discrimination based on status, gender, religion, nationality or ethnic group, language, marital status, age, disability or clan/political affiliation.
- All Project Staff are required to display irreproachable conduct with the beneficiaries of the project, employing particular caution when dealing with the most vulnerable and disadvantaged groups.
- All Project Staff should avoid offering preferential treatment towards individuals, use his/her position

of authority or power to give favors to any specific groups, and must remain courteous to the communities in the project targeted locations.

Fraud, Conflict of interest and the abuse of Power

- Conflict of interest may occur when project staff interests interfere with the performance of his/her official duties or call into question the qualities of integrity, independence and impartiality required from the project staff. This can happen when personnel, directly or indirectly, benefit improperly, or allow a third party and/or pressure groups to benefit from project activities using power or authority.
- All Project Staff are expected to refrain from any action aimed at obtaining an unauthorized benefit, such as money, goods, services or other personal or commercial advantages in any form.
- All Project Staff duty bound to avoid being in a position of authorizing work assignments, consultancy roles, benefits or service contracts to any persons or companies with whom he/she has personal, family or financial interests.
- All Project Staff are forbidden to solicit or accept money, gifts or favors of any kind in exchange for contracts, benefits or employment offers.
- In dealing with suppliers and consultants, all recipients must favor the interest of the project, refraining from engaging in any behavior that could result in personal gain.

Harassment, Sexual Exploitation and Abuse or Gender-Based Violence

- Harassment in any shape or form is an affront to human dignity and all project staff to BULSHO must not engage in any form of harassment or abuse. All Project Staff must be provided guidance on what constitutes harassment and abuse of authority and how unacceptable behaviors will be addressed.
- All Project Staff must not use language or behaviour towards women, children (anyone age 18 or under) or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- All Project Staff should not engage in or benefit from any form of sexual exploitation and abuse or gender-based violence or crimes, including sexual harassment (for instance, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life etc.), sexual exploitation or abuse (for instance, exchanging money, employment, goods or services for sex or sexual favors, or making promises or favorable treatment dependent on sexual acts – or other forms of humiliating, degrading or exploitative behavior), or any other form of sexual abuse or violence.
- All Project Staff should not participate in sexual contact or activity with children (anyone age 18 or under). Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
- All Project Staff must remain vigilant during the field visit for all instances of sexual or gender-based violence and, where discovered, report such instances to relevant local authority and or authorized service provider.

Harassment, Abuse and Sexual Relations in the place of work

- All Project Staff, regardless of sex, age, position, type of contract or status, are responsible for ensuring that the workplace is free from harassment, exploitation and abuse. In addition, they are also responsible for discouraging and reporting unacceptable behavior. (Article 298) It criminalizes rape and all forms of sexual violence.
- All Project Staff are entitled to enjoy a work environment that is free from discrimination and harassment – psychological, verbal, and sexual or any other form – and abuse. The Project Management Team will not tolerate any deeds or conduct by any member of project staff that could be considered harassment, exploitation or abuse.

- All Project Staff members are responsible for taking assertive action if they believe they are subjected to, or become aware of, harassment, intimidation, discrimination or abuse, regardless of its nature and who the alleged offender is, either by immediately bringing the unwelcome conduct to the attention of the offender – who may not be aware of the possible offence – or by reporting it to the direct line manager or through the dedicated GBV/SEA/SH Grievances Mechanism in place
- All managers are required to display a high level of professional behavior and personal conduct and ensure that any incident relating to unacceptable behavior is promptly addressed and corrective action taken, as established by the code of conduct

With regard to Children under the Age of 18

- Wherever possible, ensure that another adult is present when working in proximity of children.
- Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
- Use any computers, mobile phones, video, and digital cameras appropriately, and never exploit or harass children or access child pornographic material through any medium (see also “Use of children's images for work-related purposes” below).
- Refrain from physical punishment or discipline of children.
- Refrain from hiring children for domestic or other labor, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities or places them at significant risk of injury.
- Comply with all relevant local legislation, including labor laws in relation to child labor.

Use of Children's Images for Work-Related Purposes

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this, I must explain how the photograph or film will be used.
- Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

Use of drugs

- All Project Staff members shall not use drugs, alcohol, and khat and should not be under the influence of drugs while on duty.

Use of Assets

- The Project Staff are expected to return any assets provided by the project for carrying out specific functions to at the end of the assignment, unless an alternative solution has been advised in writing. Unjustified possession of assets will always be considered as misappropriation.

Use of Vehicles

- All Vehicles provided by the project to staff can be used only for the operations of project activities and for safety reasons. Any other use, not expressly authorized, implies that the user personally assumes all costs and risks involved.

Use of Equipment's and IT instruments

- All equipment and IT facilities can be used only for the operations of project activities and all due care and precautions should be adopted while using them.

Duty of Discretion

- All Project Staff must maintain the utmost discretion with regard to project information acquired in the course of their work and all information must be treated confidentially.
- All Project Staff are prohibited from commenting on allegations related to the project unless they obtained the express prior consent of the project management.
- All Project Staff must not permanently store outside the workplace documents, including in electronic format, which were created in the course of their work for the purpose other than their work.
- It is forbidden to send or store information requiring special handling using IT facilities whose security is not guaranteed by the project.

Right and Obligation to Report and Investigate All Violations

- All Project Staff have the right and obligation to report any known or suspected violation of this code of conduct.
- Any reported information concerning the violation of one or more of the Code's rules will be kept strictly confidential, will be registered and securely archived and will only be disclosed when necessary.
- The Project Management Team retains the right to initiate an internal investigation in order to acquire further information regarding the alleged violation of one or more provisions of the Code. Any such investigation will be confidential and timely.
- The Project Staff or any person subject to the complaint must be offered the opportunity to explain and / or respond to the charges made before any disciplinary action is taken. In the case of a criminal offence, the concerned party must be informed that, in addition to disciplinary action, the case may be reported to the relevant legal authorities for further investigation.
- Any declaration or intentionally false accusation against another member of staff or third party will be considered gross negligence, which may lead to the individual being held responsible within the limits provided for by current legislation.

Staff Awareness, Safeguards and Healthy Working Environment

- All Project Staff remain responsible for their actions. It is the responsibility of staff to read the Code of Conducts. If any of the provisions contained within this Code of Conduct and related codes of practice are not fully understood the project staff must, in their own interests, seek clarification from their project coordinators.
- All Project Staff must be briefed about this Code of Conduct and any disciplinary measures individually or at a team meeting by the Project Management Team.
- The Project Management Team are required to provide all project staff a safe and healthy working environment, recognizing the possible inherent dangers and limitations presented by the local environment and will ensure that reasonable precautions are taken to protect relevant staff in high-risk or life-threatening operations.
- The Project Management Team are required to ensure all project staff are able to perform their duties in accordance with the principles of this Code and ensure that they meet appropriate physical and mental fitness standards to perform their contracted duties.

Implementation of the Code

- The Project Management Team are required to ensure that all Personnel contracts include appropriate incorporation of this code and relevant and applicable labour laws terms and conditions will be clearly communicated and available in a written form to all Personnel in a format and language that is accessible to them.
- All Project Staff must sign a declaration acknowledging intent to comply with the Code of Conduct.

- The FGS and FMS Ministries and Agencies employing Project Staff are responsible for the provisions of the code. They are required to take a strong stance against misconduct, reminding staff at all levels to comply with the code of conduct. They are also required to report cases to the Project Management Team.
- All project beneficiaries must be informed of the code of conduct when the project is launched and again at the midway point of project implementation.
- All project beneficiaries must be informed and have access to means of reporting any cases or potential cases of misconduct through a safe and reliable means established by the project grievance mechanism
- Any Project Staff accused of grave misconduct or illegal acts will face disciplinary action including immediate termination of their contracts.

Sanctions

- I understand that if I breach this Code of Conduct, my employer will take disciplinary action, which could include:
 - Oral warning;
 - Written warning;
 - Additional training;
 - Loss of up to one week's salary;
 - Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months;
 - Termination of employment; and
 - Report to the police if warranted.

Declaration

I, the undersigned, _____ certify that I have read the Code of Conduct, that I understand all its provisions and that I undertake to adhere it.

I am aware that failing to comply with the Code shall result in disciplinary actions and that a serious lack of compliance could result in immediate dismissal.

In witness whereof, the undersigned has signed on this _____ day of _____ 2025.

Signature

ANNEX 2: Proposed Reporting Process and Protocol for receiving Complaint Related to SEA/SH

As revealed by the recent stakeholders consultations (see Section 4), there are limited formal and dedicated mechanisms for reporting SEA/SH related complaint within the community/project area, with most cases being handled informally by village elders and religious and community leaders. Consequently, the stakeholder recommended that the project team to address the existing gap by establishing a mechanism to enable reporting in a safe, confidential survivor-centric manner

The reporting process and protocol in the CoC upholds confidentiality of information shared by the survivors. Through this process, the SEA/SH survivors and others will know to whom they should report and what sort of assistance to expect from the health, social welfare, law enforcement, legal and justice sectors.

At the FGS level, the Project Coordinator and the Social Safeguard/GBV Specialist will be the Focal Point (FP) on matters SEA/SH complaints. AT the FMS level, the Project Manager and the social/GBV officers to be appointed by each participating FMS will also serve as the main FPs for handling GBV related grievance. Further, the project will provide various avenues for reporting GBV SEA/SH cases. Such avenues include through the FGS Project Coordinator and the FGS Social Safeguard/GBV Specialist, FMS Project Manager and social/GBV officers serving as the focal points, staff handling the call centers, or through the GM Hotline Operator. In addition, the project will have a toll-free line managed by the GBV Specialist and, email address where such complaints can be raised.

For the BULSHO program, a project Grievance Mechanism (GM) has been proposed for implementation in the Stakeholder Engagement Plan (SEP). The SEP has also recommended a separate GM to manage SEA/SH-related complaints to enable reporting survivor to report in a safe and confidential manner. The proposed steps below as outlined in the CoC (in Annex 5) can be applied for the BULSHO project

- In line with the survivor-centered approach, the SEA/SH FPs to whom an allegation is disclosed will provide a safe, caring, and supportive environment. This means being non-judgmental, empathetic, compassionate, and demonstrating emotional support to the survivor while clarifying relevant information. It also means respecting confidentiality and the wishes of the survivor.
- Once a case has been taken in by the SEA/SH FPs, informed consent of the survivor will be obtained to proceed with the case and the case file/information will be submitted to the FGS Social Safeguard/GBV Advisor. The information to be collected from the person reporting will be: (a) age and gender, (b) nature of the complaint in the survivor's own words, and whether (c) the perpetrator was known to him/her and is related to the project (d) were offered referral to services.
- The social/GBV officer will ensure that the survivor has been provided with all necessary GBV referral services, is safe and will arrange for any required emergency support and concurrently refers the case to a SEA/SH service provider.
- The service provider to contact PC who will report any serious SEA/SH incident to the Bank within 24 hours.
- The case can be referred to the police as appropriate and according to the law.
- Upon resolution, the SEA/SH FPs and SEA/SH Services Provider will advise the survivor that it has been resolved and closed out.

ANNEX 3: Sample of GBV SEA/SH Referral Centers and Service Providers in Somalia

Abdurrahman Please populate

No	Name	Physicals Address	Contact

Annex 4: Outcome of Stakeholder Consultation

Consultations sessions with various stakeholders were held on 13th January 2025 in Jubbaland and, 16th - 20th January 2025 in the remaining states of Puntland, Galmudug and Hirshabelle. The consultations brought together stakeholders from government entities at FMS level, municipality officials, youth, civil society and media, women, community organizations, ethnic minorities and People With Disability (PWD). As shown in Table 1, a total of 114 stakeholders constituting 79 Males and 35 Females were consulted.

Table 3: Stakeholders Consulted, Number of Participants and Gender

State	Stakeholder(s)	Date of Consultation	No of Participants	
			Male	Female
Jubbaland	MOIFAR	13 th January, 2025	1	0
	Municipality officials	13 th January, 2025	3	0
	Community	13 th January 2025	34	21
Puntland	Community	14 th January 2025	6	5
Hirshabelle	Community	16 th January 2025	16	4
Galmudug	Mixed group*	20 th January 2025	19	5
Sub Total			79	35
Total			114	

* as described in the above paragraph

The consultations were structured around key thematic areas including : i) presentation of relevant project information such as project objectives and target beneficiaries, potential E&S risks and impacts, mitigation measures, the proposed SEP, and other E&S risk management instruments; ii) stakeholder mapping and analysis; iii) approaches to stakeholder engagement and information disclosure; iv) targeting and inclusion; v) grievance management; vi) past experiences regarding forms of GBV SEA/SH in the project area and management approaches and vii) Environmental Health and Safety concerns including climate change risks and impacts in the project area. Table 2 presents a summary of the stakeholder consultations and some of the key recommendations made. More details of the same (raw data) including photographs of the consultation sessions, list of participants and stakeholders identified are presented under Annex 1, 2, 3 and 4.

Table 4: A summary of the findings of the Consultation held with stakeholders

Aspect	Key Recommendations by Stakeholders
SEA/SH and other forms of GBV (e.g., IPV)	<ul style="list-style-type: none"> Forms of GBV experienced at the community level include domestic violence, early marriage, and workplace Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA) that can occur in humanitarian settings, where vulnerable populations may be exploited by aid workers or community leaders. Other forms include rape, domestic abuse, trafficking of women, girls, and boys, along with detrimental traditional practices such as female genital mutilation/cutting, and bride inheritance, among others. Physical, emotional, and psychological abuse within households is common and often normalized by cultural practices. Rape and sexual assault, which can occur in both public and private settings with women and girls being particularly vulnerable. Early and forced marriages where young girls may be married off at a young age, often against their will, leading to various forms of abuse. Female Genital Mutilation (FGM) practiced in some communities is a harmful traditional practice that poses serious health risks and violates the rights of women and girls. All the above forms of GBV, are managed through dialogue and negotiation led by clan and or religious leaders. It is important to note that currently, there are limited formal and dedicated mechanism for reporting GBV SEA/SH within the community, with most cases being handled informally

Aspect	Key Recommendations by Stakeholders
	<p>by village elders and religious leaders and community leaders. With the existing gap in formal management of grievances related to GBV SEA/SH, the project team needs to take appropriate measures to address it.</p> <ul style="list-style-type: none"> • There are a few Non-Governmental Organizations(NGOs) such as ALIGHT (in full???) former ARC (in full???), Save the Children who work with the Ministry of Gender that offer such services, but have low capacity in terms of technical competence and limited outreach due to inadequate resourcing. • The activities of these NGOs on GBVSEA/SH aspects are not fully integrated with municipal programs. They work independently and rarely share information and data with municipality officials or even government entities and this issue needs to be address for the project to be effective in managing GBV SEA/SH complaints. • The project team needs to leverage on these efforts by partnering with such NGOs in conducting community awareness campaigns, training of project staff on handling GBV SEA/SH related complaints and also during establishment of specific grievance mechanism for safe reporting and handling of GBV SEA/SH complaints. • Enhance support for a multispectral strategy to aid survivors of GBV, highlighting the necessity of integrating sexual and reproductive health services with GBV services. Additionally, there is need to establish pooled funding mechanism designed to meet urgent GBV needs and services in remote regions, which should include Mental Health and Psychosocial Support Services, protection, health care, and safe spaces for women, girls, and boys. • Further, the project needs to create a dedicated GBV response units at FGS, FMS and Municipal level mostly with women employees, establishing safe spaces for survivors, and launching awareness campaigns and more sensitization programs. Where feasible special laws focusing on addressing GBV SEA/SH to be enacted with heavy punishments to stop it. • Develop clear procedures and protocol for prevention, reporting, and response for GBV SEA/SH. Set up confidential and accessible reporting channels including hotlines, suggestion boxes, and implement community awareness campaigns to educate the public about SEA/SH and GBV, their effects, and the importance of reporting incidents. • Conduct regular training sessions for staff, community leaders, and volunteers on identifying, preventing, and responding to SEA/SH and GBV. • Involve local leaders and influencers to change cultural attitudes and norms that condone violence. Foster collaboration between governmental bodies, NGOs, and community organizations to create a unified response to SEA/SH and GBV. Involve men and boys in advocacy and prevention efforts to promote gender equality.

List of Participants for stakeholder Consultations

The list of participants is not publicly disclosed to align with data protection provisions.