



Government of the People's Republic of Bangladesh

**ACCELERATING TRANSPORT AND
TRADE CONNECTIVITY IN EASTERN SOUTH ASIA (ACCESS) – BANGLADESH PHASE 1 PROJECT
AS PART OF A MULTIPHASE PROGRAMMATIC APPROACH (MPA)**

- **Bangladesh Land Port Authority (BLPA)**
- **National Board of Revenue (NBR) and**
- **Roads and Highways Department (RHD)**

Gender and Sexual Exploitation and Abuse (SEA)/ Sexual Harassment (SH) Action Plan

December 2022

Table of Contents

GENDER ACTION PLAN	7
Country and Institutional Context:	7
Institutional Capacity	7
Gender Action Plan	8
SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH) PLAN	13
SEA-SH Action Plan	13
Budget	19
Annex I: Sample Labor Code of Conduct covering theSEA/SHA related risks	21
Annex II: SEA/SH Risks Assessment in the Project Areas	24
Annex III. Project Grievance Mechanism to address SEA/SH Allegations (this model will be further tailored to the project needs)	26

Abbreviations and Acronyms

C-ESMP	Contractor's Environmental and Social Management Plan
CoC	Code of Conduct
E&S	Environmental and Social
ESA	Environmental and Social Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESIRT	Environment and Social Incident Response Toolkit
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
GBV	Gender-based Violence
GCLS	Grievance Complaint Logging System
GPN	Good Practice Note
GM	Grievance Mechanism
HIV/AIDS	Human Immunodeficiency Virus/Acquired Immune Deficiency Syndrome
IA	Implementing Agency
ICB	International Competitive Bidding
IPF	Investment Project Financing
ISR	Implementation Status Report
IVA	Independent Verification Agent
M&E	Monitoring and Evaluation
NCB	National Competitive Bidding
NGO	Nongovernmental Organization
PCN	Project Concept Note
PMU	Project Management Unit (also referred to as a Project Implementation Unit, or PIU)
QER	Quality Enhancement Review
SBD	Standard Bidding Document
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SEP	Stakeholder Engagement Plan
SPD	Standard Procurement Document
TOR	Terms of Reference
TPM	Third-Party Monitoring organization for SEA
VAW	Violence Against Women
WHO	World Health Organization

Glossary

Child marriage refers to any formal marriage or informal union between a child under the age of 18 and an adult or another child (UNICEF).

Gender Equality refers to “how all these aspects determine how men and women relate to each other and the resulting differences in power between them.” While equality focuses on creating the same starting line for everyone, equity aims at providing everyone with the full range of opportunities and benefits – the same finish line.

Gender Inequality refers to unequal treatment, opportunities or perceptions of individuals based on their gender. Power imbalances and gender inequalities exist in most societies, even in those considered champions of gender equality. The nature and degrees of gender differences vary from one society to the next, but they typically favor heterosexual men. Policies and interventions can exacerbate or mitigate existing gender inequalities, but they can also maintain the status quo. In order to spur development, WB interventions should aim to challenge the status quo in order to achieve gender equality.

Gender Norms are “a set of rules or ideas about how males and females should behave.” They are not based on biology, but instead are determined by culture and society.

Gender Based Violence (GBV) is an umbrella term for any harmful act perpetrated against a person’s will and based on socially ascribed (that is, gender) differences between males and females. GBV includes acts inflicting physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, occurring in either public or private life.

Human trafficking in persons is defined as the recruitment, transportation, transfer, harboring or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power, or of a position of vulnerability, or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Women and children are particularly vulnerable to trafficking practices (Environmental and Social Standard (ESS) 2, footnote 15).

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

Sexual Abuse is “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.”

Sexual Harassment is any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of sexual nature.

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

Violence against women (VAW) is as any act of violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life. Article 2 of the Convention further states that violence against women shall be understood to encompass, but not be limited to, the following: (a) physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the

household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation; (b) physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced sex work; (c) physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs. The term violence against women and girls is also used.

INTRODUCTION OF THE PROJECT

The Accelerating Transport and Trade Connectivity in Eastern South Asia (ACCESS) is aimed at supporting the Government of Bangladesh in establishing a functional and empowered institutional structure, capable of formulating and implementing the envisioned long-term program to facilitate trade and related outcomes in the country. The project will be implemented by the Bangladesh Land Port Authority (BLPA), Bangladesh National Board of Revenue (NBR), and Roads and Highways Department (RHD).

The GoB would establish (within three months of effectiveness) and maintain a Project Steering Committee (PSC). The will include the heads of agencies from BLPA, NBR, and RHD and meet at least every six months for the purposes of; (i) providing strategic and policy direction on all project activities, (ii) reviewing progress in project implementation, and (iii) facilitating the coordination of project activities and addressing obstacles during project implementation. In Bangladesh, the Phase 1 of the Program (Project) will have 3 components:

Component 1: Digital Systems for Trade – Digital Systems for Trade will support the transformation of the cross-border clearance process through the provision of digital solutions and automation to manage the projected increase in trade. The digital solutions will be designed to eliminate manual and paper-based processes, resulting in faster border crossing times. Digital systems are especially relevant in the context of the COVID-19 pandemic, where it has become imperative to reduce touch points and human interaction, and to build resilience to future pandemics and other crises. Under BLPA, this component will support the development of a multiagency electronic Border Management System (e-ABMS) aimed at improving the processes of the land border agencies, such as cargo handling, storage, tariff calculation, and levy payment procedures. Under NBR, the component will support development of e-learning portals for the Customs, Excise and VAT Training Academy, Chattogram (CEVTA) and the Customs Risk Management Commissionerate (CRMC) and supporting software for risk profiling with uninterrupted data interchange.

Component 2: Green and Resilient Transport and Trade Infrastructure - This component will support green and resilient transport and trade infrastructure development along key regional corridors in Bangladesh. This component will support (a) developing efficient and resilient land ports at Benapole, Bhomra, and Burimari to meet increasing trade and traffic demand; (b) constructing a state of the art green-building certified, resilient Custom House Chattogram (CCH); (c) developing CEVTA to institutionalize the NBR's capacity building programs and enable continuous human resource development; (d) carrying out a feasibility, detailed design, supervision and interior design consultancy for the CCH and CEVTA; (e) upgrading the Sylhet-Charkhai-Sheola Section (43 km) from a two-lane single carriageway to a climate-resilient four-lane dual carriageway; and (f) installing of climate-resilient optical fiber cable ducts and an intelligent transport system for the road section, designed to improve availability and reliability of broadband connectivity. Land ports and customs houses will be designed and constructed as climate resilient and green facilities, including, where appropriate, solar co-generation combining photovoltaic (PV) and solar thermal technologies, rainwater harvesting systems, and energy and water efficient fixtures. Roads and bridges under the Program will be built to a higher climate resilience standard. In addition, this program will support evidence-based road safety interventions using a “safe system approach” to demonstrate the impact on reducing road crash deaths and injuries.

Component 3: Institutional and Policy Strengthening for Transport and Trade - This component is anchored in the implementation of the WTO TFA, simplification and harmonization of customs procedures under the World Custom Organization (WCO) Revised Kyoto Convention, and Bangladesh's national customs modernization plans. Technical assistance will be provided to advance risk management, transit facilitation, customs cooperation, simplifying paperwork, and harmonizing customs requirements. A key strategic feature of the project is the development of next-generation regional projects. This will include comprehensive trade gateway connectivity assessments to improve the congested and less developed transport sections that lead to ports, rail and inland water terminals, and international borders, as well as the provision of feasibility and design studies for additional land port and customs infrastructure, and other priority sections of the country's regional road network.

GENDER ACTION PLAN

Country and Institutional Context:

The share of female entrepreneurs in Bangladesh is low but growing. According to the Bangladesh Economic Census 2013, there are 7.8 million entrepreneurs in Bangladesh, of which only 7.1 percent are women (Bangladesh Bureau of Statistics 2015a). Women own only 15 percent of firms in the country (World Economic Forum 2017). Female entrepreneurs are concentrated in a smaller number of sectors and industries when compared to male entrepreneurs and are largely relegated to lower positions. Relatively few women-owned firms are also involved in cross-border trade. Furthermore, consistent with global patterns, women-owned enterprises in Bangladesh are more likely to be small, informal, and home-based compared to male-owned enterprises¹. Women also appear to be far less involved in cross-border trade than men despite the economic opportunity it presents. This limited participation is, in part, explained by the limited access to assets, constricted export opportunities, poor infrastructure at borders and ports, cumbersome bureaucracies, lengthy clearance processes, corruption, and frequent documentary and other non-tariff barriers tend to be especially challenging for vulnerable female traders operating on a small-scale resulting from their smaller size relative to male-owned firms².

Women's access to institutions and programs that support trade and entrepreneurship is also low, contributing to their difficulty in establishing contacts with potential buyers³. Furthermore, workplace and market-based entrepreneurial activities are considered to be *male domains* and work opportunities as vendors, purchasers, or middlemen are greatly restricted for women, in part due to mobility restrictions (Asadullah and Wahhaj, 2016). Socio-cultural barriers, occupational segregation, poor access to capital and financing options, limited skills and access to trainings, lack of female-friendly facilities such as women's restroom, childcare services, sexual harassment at workplace and discrimination, limited mobility, lack of access to professional networks are some of the underlying constraints leading to gender gaps in the economic outcomes experienced by men and women.

Institutional Capacity:

The project will be implemented by the BLPA, NBR, and RHD. Each Implementing Agency (IA) will establish and maintain project implementation units (PIUs) that will be: (i) headed by a Project Director; (ii) staffed by full-time technical experts and specialists in procurement, financial management (FM), environmental, health and social aspects, and monitoring and evaluation (M&E); and (iii) responsible for the day-to-day implementation of their respective parts of the project, including preparing financial and project reports, and annual work plans and budgets. The GoB will establish and maintain a Project Coordination Committee (PCC) to provide strategic direction on project activities and review progress. The roles and responsibilities of each PIU, as well as specific fiduciary, safeguards, technical, and monitoring guidelines, will be detailed in the Project Operations Manual (POM). The BLPA, NBR, and RHD are expected to be the IAs for the CERC component, unless the Emergency Response Operations Manual specifies otherwise. Annex 2 provides more details on the implementation arrangements. Although the implementing agencies have a dedicated E&S Unit, to comply with the Bank's new Environmental and Social Framework (ESF), the PIU will require additional dedicated personnel and staff for addressing gender needs of the project. It is intended to institutionalize the overall implementation of gender action plans.

¹ Bangladesh Bank 2014

² World Economic Forum 2017

³ Bangladesh Bank 2014

Gender Gaps:

The Program will adopt several approaches to enhance the participation of women entrepreneurs in trade. The Program has identified four key entry points that can be applied across countries.

Policies. Through its support to the NBR and BLPA for enhanced trade facilitation, the project will support simplified trading across border facilities for women traders and introduce policy and regulatory simplification through the National Trade Facilitation Committee working group for women traders (supported under the BRCP)

Skills. The project will support the NBR CEVTA in providing training programs on trade related policies, regulations, and processes as well as IT-enabled services that will target women traders and entrepreneurs. The project includes a results indicator measuring the increased level of knowledge of the participating women through a pre- and post-training test; .

Infrastructure. The project will support the BLPA and NBR to construct trade infrastructure with gender specific features, such as separate toilets and WASH facilities for women. The CCH will have childcare facilities and a designated service desk for women; and .

Human trafficking. The project will support the BLPA to engage a non-governmental organization or other organization to carry out awareness-raising programs at the Benapole and Bhomra land ports and conduct training programs on human trafficking for border agencies and local officials. The border points have been selected because an ongoing study on human trafficking in Bangladesh has highlighted Jashore as a location where multiple forms of trafficking occur. .

Gender Action Plan:

The Gender Action Plan ensures that gender equality is considered in project preparation and implementation in accordance to the Country Partnership Framework and System Country Diagnostic, and Climate Change Action Plan 2021-2025. The Gender Action Plan also ensures compliance with the World Bank's support of the Sustainable Development Goals and 2015-23 World Bank Group Gender Strategy. It aims to move the Bank's development work beyond gender mainstreaming to reducing gender gaps in the disaster and climate change sector. The proposed Gender Action Plan will be further revised by the gender specialist in the PIU before the start of implementation.

The overall objective of the Gender Action Plan is to address underlying constraints that contribute to gender disparities in women's trade and entrepreneurship including women's lower access to skills training, lack of infrastructure that responds to women's priorities, sexual harassment, safety concerns, limited mobility, and lack of access to professional networks. The proposed activities will affect women's access to trade opportunities by addressing safety concerns and mobility challenges, reducing the risk of human trafficking, and creating opportunities. This action plan aims to scale up activities towards promoting gender equality in accessing jobs, and increasing numbers of women entrepreneurs through improved facilitation packages for creating opportunities and integrating more women in trade. A pre- and post-assessment will be done to measure the gender indicator (increase level of knowledge for women entrepreneurs).

This Gender Action Plan (GAP) outlines detail actions associated with particular objectives to facilitate women in trade. Please see the table below:

Gender Action Plan

Objective	Actions	Responsibility	Timeline
Policy Level Actions			
Recruitment of an NGO	Implementation plan in coordination with GBV specialist and PIU.	PIUs	
Diagnostic assessment of policies to remove barriers for women in trade by improving regulations	a) Conduct a standalone study on the regulatory policy environment to understand barriers to female job seekers, entrepreneurs and identify policy recommendations for removing barriers and improving regulations and bureaucratic procedures for women.	Consultant/Firm under the supervision of PIUs	Removing barriers by improving regulations
Policy dialogues	Policy dialogues with diverse government agencies and non-government stakeholders such NGOs to determine a) how gender gaps in trade and business can be reduced; b) how to promote women's involvement in trade that tend to be male dominated; and c) effective affirmative action within institutional policies	PIUs	Within one year of the project
Promote gender inclusion through capacity and awareness building	Based on outcomes from policy dialogues, capacity building for PIU to facilitate opportunities for women in male-dominated sectors and improve working conditions safety, equal salaries, working hours etc. and, professional growth opportunities.	BLPA, NBR, RHD with the help of the PIU gender specialists	Implementation throughout the project
Program Level Actions			
Improving trade-enabling infrastructure design and address features that constrain women from accessing port facilities	<p>Designing terminals and transportation with gender specific features including relevant safety related concerns:</p> <ul style="list-style-type: none"> • Employ women cleaners for women toilets for sustainable maintenance. • Separate toilets and WASH facilities • Separate waiting and rest rooms & breast-feeding room for women employees and visitors. • Facilities to cater trade facilities for women with trade (office, desk space, and storage, help desk for women to access information and day care center for children). • Women only desk for providing fast services • Adequate lighting and easy signage/instruction for women so that everyone understand. <p>The design features of the road, placement/location of bus stops along the highway, access and pedestrian infrastructure will be selected based on a need's assessment for women</p>	BLPA, NBR	Project life cycle

	<ul style="list-style-type: none"> • Install proper signage in the appropriate places • Proper lighting in the bus stops 	RHD	
	Targeted outreach for the community including government officials on creating favorable conditions (i.e., improving mobility, free from GBV) and engaging men to address social norms constraint women’s access to trade.	BLPA, NBR, and RHD	Project life cycle
Training support to different groups of women with varying degrees of capacity building and awareness needs.	<p>Focus groups should include:</p> <ul style="list-style-type: none"> • Women who want to set up enterprises to cater to wide range of growing economic activities in the area, and • Existing women-led enterprises who want to grow their business and lack supports • The most vulnerable women including the ultra-poor, elderly, and disabled <p>Trainings on skills, financial literacy and access to finance, improving productivity, trade licenses, import and export registration certificates, quarantine measures, customs requirements, and market access including product management, sales and storage.</p> <p>The training program will include a module on emergency preparedness and mitigation measures for extreme weather events and identifying early warning systems during natural disasters.</p> <p>Emphasis will be placed on ensuring that women from hard to reach areas are engaged and a diverse and inclusive group of women are included for the training programs. A targeted strategy will be developed on how to reach these women.</p>	PIUs: NBR, RHD and BLPA	<p>Procedures to be finalized before training</p> <p>Implementation throughout the project</p>

<p>Anti-Trafficking Coordination and Prevention Committee: Form a coordination committee with a group of people from all relevant government agencies (with border guard and police) and working around this issue</p>	<ul style="list-style-type: none"> • Coordination amongst various law enforcement agencies involved in the monitoring, prevention and dealing of human trafficking (e.g. police, RAB, special forces, NGO's, government agencies etc.). • Information exchange platform, which would facilitate knowledge sharing across the border to prevent and effectively handle human trafficking. • Yearly trainings, workshops and discussions will take place to share knowledge. • Build an internal network so that all law enforcement agencies are aware and there is no coordination failure. • Involve Civil Society Organizations (CSOs) to raise awareness around human trafficking, challenges and potential prevention methods involving collaboration. • Distribute print media (posters, leaflets, brochures) in the target areas to raise awareness. • Posters in the junctions to ensure that the message is reaching the maximum number of people. <p>Knowledge sharing and dialogue between cross border land ports and NGOs around the trafficking issues</p>	<p>BLPA</p>	
<p>Targeted outreach at the project sites on the risk and consequences of human trafficking</p>	<p>Communications targeting female traders within the overall project's communication strategy. Use different forms of media to reach women.</p> <ul style="list-style-type: none"> • Develop targeted communication and community campaign for female traders covering norms around religious and cultural barriers to change perception and break stereotypes. • Stakeholder consultation meetings involving only women. • Special extensive outreach campaign through community mobilizations for vulnerable women who may be difficult to reach. • Inform community about the risk of human trafficking through round table and training session. • Develop communication targeted at training institutes on gender issues; more specifically risk associated with human trafficking. 	<p>BLPA</p>	

Building capacity of officials at border, collaborating with civil society organizations combating human trafficking	Arrange trainings and workshops for govt. officials to provide them with thematic knowledge about human trafficking.	BLPA	
Increase women employment in the land ports and transport administrative sector.	Ensure female participation in the transport administrative sector and land ports.	BLPA, NBR and RHD	
Women in COVID	In light of COVID-19, targeted communication to reduce drop-out among women entrepreneurs who are likely to do so due to increased financial burden. Training on financial risk management so that women are aware of how to handle risk in such adverse situation. As SEA/SH has increased under lockdown situation, link individuals seeking help with service providers who are operating during COVID lockdowns.	PIUs, Task team, gender specialist	

SEXUAL EXPLOITATION AND ABUSE (SEA) AND SEXUAL HARASSMENT (SH) PLAN

The SEA/SH Plan is prepared to meet the requirements of the World Bank's Environmental and Social Framework (ESF) for the BBIN Regional Transport and Trade Facilitation Program – Bangladesh Phase 1, most particularly to ensure the Environmental and Social Standard on Working Conditions (ESS2) and the Standard on Community Health and Safety Labor (ESS4).

The project's SEA/SH risk was assessed as 'Moderate' at PCN stage. This is escalated to 'Substantial' SEA/SH risks based on the Bank's SEA/SH risk assessment tool for projects with major civil works in line with the associated Good Practice Note (GPN), and findings from the ESIA. The risks arise from the land acquisition and subsequent involuntary resettlement involved in the project. Risks are also increased due to labor influx in multiple project areas along the regional corridors exist, particularly that the potential construction sites are located in proximity of educational establishments, and both BLPA and RHD have major resettlement involuntary rehabilitation. Human and sex trafficking targeting girls and women is common in the border areas. It could exacerbate the program's SEA/SH risks, especially since project interventions will include digital solutions to reduce touch points, human interaction, paper use, and truck idling. The NBR sites are located in Chattogram, the second largest urban agglomeration in Bangladesh. So, labor influx is anticipated for NBR. However, the labor influx is not expected to be significant with the unskilled and most of the semi-skilled labor to be sourced locally. Furthermore, the project sites are all located in peri-urban and urban and easily accessible areas and thus, would not be difficult for monitoring the SEA/SH related risks. A further SEA/SH/GBV risk assessment in the project areas is attached in Annex-II

The SEA/SH Action Plan includes the relevant risk mitigation and management measures including: (a) dedicated SEA/SH Experts at the PIUs with BLPA and RHD with Gender or Social Development Expert with NBR; (b) incorporating the necessary provisions in the bid documents; (c) Code of Conduct for the project workers (d) SEA/SH compliant GRM with specific protocols for handling grievances on SEA/SH; (e) budgetary provisions with for service providers with BLPA and RHD, and; (f) raising awareness on SEA/SH among the beneficiary communities, stakeholders and IAs under BLPA.

SEA-SH Action Plan

The SEA-SH Action Plan takes a comprehensive approach to include both prevention measures—sensitizing the communities and other stakeholders, strengthening the institutional capacities and mitigation measures targeting project related potential risk of SEA/SH in the project affected population.

An implementing partner organization (PO) with experience working in SEA-SH will be identified to provide technical support to effectively implement the SEA/SH Action Plan and in the process build capacity to address such issues. The PO will identify GBV service providers in order to provide referrals to support services in the likelihood that an incident occurs. A survivor-centric approach will be followed - all through, victim/survivors' care, ensuring confidentiality of the cases and providing access to different referral mechanisms that connect to the GM are considered key aspects of this plan. The approach aims to create a supportive environment in which each survivor's rights are respected and in which the person is treated with dignity and respect. This SEA-SH action plan will also take preventive approach by taking few significant standard interventions in line with safety and security of female traders.

PIU will set up the GRM based on local resources and mechanism on SEA/SH response and World Bank Guiding Model. Under this model, an existing intermediary—in the projects' case an implementing PO—will be tasked with developing case reporting and response protocol, providing capacity building training on GRM, and promptly addressing SEA-SH allegations by ensuring survivors a referral pathway to local GBV service providers. The intermediary will be selected by the PIU in consultation with the World Bank based on its qualifications and experience in the relevant areas.

The SEA-SH allegations can be reported, just like any other project-related grievance, using a regular project-level GM channel. The GRM focal person of the PIU will follow up the SEA/SH related cases with the selected NGO, where NGO will be given responsibility to make the link between survivors and local service providers, special emphasis will be given to them those who are mainly active remotely in COVID situation. As the intermediary is the NGO implementing the SEA/SH action plan, it will not serve as a service provider but rather as a linkage to service providers. To make the GRM more responsive to SEA/SH issues, an information sharing protocol with SEA/SH service providers will be developed so that survivor related information is carefully managed, and confidentiality is maintained. To response the COVID situation, GRM will incorporate hotlines, place community leaders and facilitate community ‘help center’ to ensure access to service provision and to promote safety and well-being of women and girls in need.

In order to tackle the SEA/SH risks, the project will take a phased approach in implementing SEA/SH prevention and mitigation measures with the help of a hired specialized NGO. BLPA will take stock of all NGO’s present around the land ports to hire a dedicated organization to implement the SEA/SH Action Plan. The NGO would provide capacity building and service provision on behalf BLPA.

- **Phase 1** will involve awareness raising, capacity building and mobilization of resources under BLPA. The IA will ensure awareness raising of SEA/SH risks, prevention and mitigation measures are given to all project actors and the wider authoritative system dealing with SEA/SH to ensure sustainable measures. Stakeholder engagement and consultation will be adequately conducted for the same. Capacity building will involve training stand and especially GRM operators. Capacity building of BLPA is needed as human trafficking may be exacerbated by more mobility induced by the project. This will be done by the hired dedicated NGO who will provide training for all BLPA staff.
- **Phase 2** will involve establishing an “Anti-Trafficking Prevention Coordination Committee,” which would be run by the dedicated NGO under the guidance of BLPA. This would involve coordination amongst various law enforcement agencies involved in the monitoring, prevention and dealing of human trafficking (e.g. police, special forces, NGO’s, government agencies etc.) along with representation of trafficking organizations for women and children. The Committee would also act as an information exchange platform, which would facilitate knowledge sharing across the border to prevent and effectively handle human trafficking. Yearly trainings, workshops and discussions will take place to share knowledge.

Furthermore, the project also needs to be mindful of providing a safe environment for vulnerable groups such as women and the disabled during operations. Training needs to be tailored to the needs of women and the disabled by providing disabled-friendly and women-friendly environment. For instance, gender segregated toilets, accessible facilities and female training instructors may be considered. A detail SEA-SH Action Plan are chalked down in the following tab

Risk Mitigation and Response Measures			
Objective	Activities	Responsibility	Timeframe
I. Preliminary activities: Integration of GBV into project documents, rapid assessment on GBV, NGO recruitment			
Clearly reflect SEA/SH risks and requirements in the safeguard instruments and expectations in the bidding documents for contractor	<p>Include relevant SEA-SH informed provisions in project bidding document.</p> <p>Inform the contractors and provide orientation/ sensitization on SEA/SH</p>	PIUs: BLPA, RHD, NBR	Prior to floating of bids
Evaluate the IA, contractors and stakeholders SEA/SH Accountability and Response Framework in C-ESMP	<p>Review existing policies and procedures IA, and other stakeholders and identify gaps in GBV prevention, response and safeguarding measures.</p> <p>Evaluate contractor's ability to meet project's SEA/SH prevention and response requirement prior to finalize the contract.</p> <p>Evaluate contractor's CoC to ensure SEA/SH provisions are included.</p>	<p>PIUs/GBV specialist with support from World Bank</p> <p>PIUs</p>	<p>December 2022 at PIU level and April 2023 in all participating institutions</p> <p>Prior to award of bid to contractors</p>
Rapid assessment on GBV/SEA-SH	Rapid assessment on extent to which training providing institutions are safe spaces; and review existing GBV/SEA-SH policies, procedures and grievance reporting mechanisms in such institutions.	PIUs support from World Bank	
Recruit GBV/Gender specialist	Appointment of a GBV specialist to monitor the activities	PIUs: RHD, BLPA, NBR	
II. Addressing GBV-related risk in project: raising awareness and sensitization			
Awareness raising campaign on SEA/SH and trainings	<p>Prepare relevant communication materials on SEA/SH and dissemination of these materials.</p> <p>Develop an awareness raising campaign on workplace safety and SEA/SH to raise awareness among all stakeholders</p> <p>Develop content and conduct targeted training and orientation session:</p> <ul style="list-style-type: none"> - Training/orientation sessions to sensitize IAs on importance of addressing SEA/SH risks on the project and the mechanisms that will be implemented. - Inclusion of a course particularly designed on SEA/SH in the training program. 	PIU/firm/consultant and Gender/SEA-SH Specialist.	

	<ul style="list-style-type: none"> - Training service providers such as apprenticeship providers or entrepreneurship training providers who have more interactions with female students will be provided additional sessions 		
Stakeholder consultation – SEA/SH issues	<p>Consultations with the project-affected local communities such as women traders, grant holders and different NGO partners to:</p> <ul style="list-style-type: none"> - inform them properly about the potential SEA/SH risks and project activities to address SEA/SH related - inform about safety concerns. - solicit input and feedback re: entry points and reporting channels for students 	Implementing POs/PIUs/Gender and Social Safeguards Specialist	Start from the project's effectiveness and runs all through the project's duration
Capacity Building of IA	<ul style="list-style-type: none"> • Training of staff to identify and handle human trafficking cases. • Stakeholder engagement and consultation. 	NGO/BLPA	
III. Establish and strengthen an effective GRM			
Establish and strengthen existing mechanisms that can respond to GBV/SEA/SH	<p>Mapping of GBV service providers or available GBV related service provision. Taking it as a starting point, prepare SEA/SH response actors in specific project implementation sites.</p> <ul style="list-style-type: none"> - Conduct a deeper quality assessment of service providers such as success rate, response of SP, time taken to resolve, reputation within the UN agencies, and etc. 	PIUs with support from World Bank on need-basis	
	<p>Identify service providers and establish linkages to provide referral and support services to survivors as per the Grievance Mechanism guidance on SEA/SH</p> <p>The coordination committee will be connected with GRM and can provide referral and support services to any traffic survivors.</p>	PIUs: RHD, BLPA	
	<p>Identifying SEA/SH focal person (trained in handling SEA/SH cases) from existing project based GRCs in each institution to monitor SEA/SH activities, including confidential reporting mechanism</p>	PIUs but discussed and agreed upon with the Task Team.	
	<p>Based on recommendations from consultations, create confidential intake channels (e.g., hotline, email/app, focal points etc.) to deal with reporting of SEA/SH cases.</p>	PIUs, Gender/SEA-SH specialist	
	<p>Set up a SEA/SH GRM hotline and develop a referral process flowchart to handle SEA/SH cases including the guidance on confidential reporting</p>	PIUs, Gender/SEA-SH specialist	

	channels, response protocol, reporting of allegation procedures, referral pathways and response framework. Ensure that the GRM responsive to GBV including human trafficking for the project is linked with protocols in the different institutions such as NGOs or private partners in line with the rapid assessment.		
	Inform the target audiences about the GRM	PIUs, Gender/SEA-SH specialist	
	Develop a safety audit tools: - By maintaining the data on SEA/SH including different types of GBV. -	PIUs, Gender/SEA-SH specialist	
Capacity building for administrative staffs and stakeholders	Develop a package of trainings for administrative staff that includes: <ul style="list-style-type: none"> • Basic ethics and CoC; staff, rights and responsibilities, positive discipline. • Measures for dealing with GBV, complaints and reporting mechanisms, services for survivors, referral mechanisms and redress procedures; • Healthy classrooms and positive discipline. • Measures to stop cyber harassment. <p><i>Topics to be covered under the trainings can be determined through consultations on training needs</i></p>	PIUs with support from World Bank	
	Develop deep-dive trainings to build capacity of different organizations on safeguarding mechanisms including CoC, GRM, GBV response protocols on and reporting and procedures to handle cases.	PIUs with support from World Bank	
	Capacity development of administrative staffs on GBV risks, including cyber harassment to mitigate risks from high online activity.	PIUs with support from World Bank	
IV. Code of Conduct (CoC)			
CoC and Circular signed and understood	Develop code of conducts for contractors, workers in civil work –specifying appropriate roles and responsibilities including specifying examples and risks of SEA/SH Carry out orientations on CoC <ul style="list-style-type: none"> • Have CoCs signed by all those with a physical presence at the project site. • Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities. 	PIUs, Gender/SEA-SH specialist, Contractor	Within 15 days of signing of contract but before mobilization of the workers on the site.
V. GBV Prevention			

Improve infrastructure and create environment for women traders	Building the custom house and land ports will consider the following preventive measures: <ul style="list-style-type: none"> • Build separate toilets, rest room, prayer room for women • Improve lighting around the project area • Follow up construction activities (appropriate signage, lighting) • Specific training for administrative staffs on safeguard measures <p>Agree, endorse and implement Code of Conduct</p>	BLPA, NBR & RHD	
	Assign female cleaners to the female toilets for all shifts.	BLPA, NBR & RHD	
	Create safe spaces for female visitors by allocating separate siting areas	BLPA, NBR & RHD	
Implement appropriate project related civil works to reduce SEA/SH risks	Have separate, safe and easily accessible facilities for women and men working on the site. Latrines should be located in separate areas, well-lit and include the ability to be locked from the inside. <p>Visibly display signs around the project site (if applicable) that signal the workers and the community that, the project site is an area where SEA/SH is prohibited</p>	Contractor, PIU	Before mobilization on the site
Anti-Trafficking Prevention Coordination Committee	<ul style="list-style-type: none"> • Coordination amongst various law enforcement agencies involved in the monitoring, prevention and dealing of human trafficking (e.g. police, special forces, NGO's, government agencies etc.). • Information exchange platform, which would facilitate knowledge sharing across the border to prevent and effectively handle human trafficking. • Yearly trainings, workshops and discussions will take place to share knowledge. 	NGO/BLPA	
VI. M&E			
Undertake regular M&E of progress on SEA/SH activities.	Conduct M&E field visits. <p>Quarterly Review of the action plan and progress to strengthen oversight and provide guidance to IA's staff and management.</p> <p>Provide quarterly report and performance reviews</p>	PIUs, Consultant, contractors	All through the project's lifetime.

Budget

This project will commit specific budget for the implementation of this Gender Action Plan. This includes dedicated staffs to support the Project Director at the PIU in the implementation and as well as commensurate resources for other associated issues. The budget is divided in 2 sections. The first sections simply are included here for reference purpose and the related budgetary resources are already included in the project's activities. The second section are specific to the effective implementation of the GBV Action Plan. The detail budget are as follows:

SEA/SH Action Plans	BLPA (BDT)	NBR (BDT)	RHD (BDT)	Total Amount In USD ⁴	Total Amount In BDT	Comment
Ensure women's participation in project activities and benefits	3,000,000	2,000,000	1,000,000	63,701	6,000,000	Lump sum for awareness sessions. BLPA: 3, NBR: 2 and RHD: 1 area.
Improve skill building activities	3,000,000	2,000,000	1,000,000	63,701	6,000,000	Lump sum for training sessions. Ibid.
<i>Support the infrastructure development</i>						
• Upgradation of project component	300,000	200,000	100,000	6,370	6,00,000	Lump sum for logistics. BLPA: 3, NBR: 2 and RHD: 1 area.
• Safe transport	300,000	200,000	100,000	6,370	6,00,000	Lump sum for logistics. BLPA: 3, NBR: 2 and RHD: 1 area.
• Mobile childcare	1,500,000	1,000,000	500,000	31,850	3,000,000	Lump sum for the space creation (i.e. Logistics/Decoration). BLPA: 3, NBR: 2 and RHD: 1 area.
• Female cleaner in the restrooms	3,600,000	2,400,000	1,200,000	76,441	7,200,000	BLPA: 3; NBR: 2; RHD:1 person for 60 months (BDT 20,000 per month)
GBV focal persons in all establishments and contactors on GRM and GBV (salaries)	9,000,000	6,000,000	3,000,000	191,103	18,000,000	BLPA: 3; NBR: 2; RHD:1 person for 60 months (BDT 50,000 per month). The IAs may also assign existing staffs
Policy dialogues/consultations	1,000,000	==	==	10,617	1,000,000	Lump sum. Included in PIU budget
Gender/SEA-SH Specialist	12,000,000	12,000,000	12,000,000	382,206	36,000,000	200,000X60 months. To be included in PIU budget

⁴ 1 USD=BDT 94.19 (as of 8th September 2022)

<ul style="list-style-type: none"> • NGO/firm/consultants to support implementation of the Gender & GBV Action Plan • Gender Assessment/research • Awareness Training & Communication materials and communication campaigns • Policy Dialogues & consultation • GBV Training & Orientation • GBV GRM • Service provision: psycho-social counselling for GBV related cases, referral services for GBV cases, etc. 	400,000	==	==	4,247	400,000	
	300,000	100,000	50,000	4,777	450,000	
	45,000	30,000	15,000	956	90,000	(Included in PIU Budget)
	300,000	==	==	3,185	300,000	(Included in PIU Budget)
	300,000	200,000	100,000	6,370	600,000	(Included in PIU Budget)
	300,000	200,000	100,000	6,370	600,000	(Included in PIU Budget)
	150,000	100,000	50,000	3,185	300,000	(Included in PIU Budget)
Total GBV + Gender Budget				861,449	81,140,000	

Annex I: Sample Labor Code of Conduct covering the GBV/SEA/SH related risks

The contracting company strongly commits to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate, or representative of the company. The purpose of this Code of Conduct is to:

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

Definitions

Sexual Exploitation and Abuse (SEA)⁵

Is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another⁶.

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

Sexual Harassment:⁷

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

Sexual Harassment versus SEA⁸

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

Consent is the choice behind a person’s voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent. **Under this Code of Conduct⁹ consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.**

There is no consent when agreement is obtained through:

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

While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual

⁵ As defined in the UN Secretary’s bulletin – Special Measures for protection from sexual exploitation and abuse October, 9, 2003 ST/SGB/2003/13

⁶In the context of World Bank Financed operations exploitation occurs when access to, or benefit from a World Bank Financed good or service is used to extract sexual gain.

⁷ Inter-Agency Standing Committee *Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community-based complaint mechanism. Global standard Operating Procedures.* May 2016

⁸ Ibid

⁹In accordance with the United Nations Convention on the Rights of the Child.

harassment which constitute gross misconduct, are grounds for termination or other consequences related to employment and employment status:

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

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

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

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

Individual signed commitment:

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

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.
- **Not** participate in SEA and SH as defined by this *Code of Conduct* and as defined under (*country*) law (*and other local law, where applicable*).
- **Not** use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- **Not** participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- **Not** solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered "non-consensual" under this Code.

I commit to:

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

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

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

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

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

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Annex II: SEA/SH/GBV Risks Assessment in the Project Areas

This risk rating will be continuously monitored and revised as more information becomes available from further assessments and consultations on non-construction related activities. Key GBV/SEA-SH risk factors from project activities are as follows:

- **Human Trafficking:** Human Trafficking is the recruitment, transportation, transfer, harboring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit. Men, women and children of all ages and from all backgrounds can become victims of this crime, which occurs in every region of the world.¹⁰ There are approximately 800,000 people trafficked across international borders annually and, of these, 80% are women or girls.¹¹ The two most common purposes for human trafficking are sexual exploitation and forced labor.¹² Hence, civil works in the border areas undoubtedly poses high risk on local women and children, which brings additional risk of SEA-SH.
- **GBV/SEA-SH by labor:** Infrastructural development would require hiring of small to moderate population of semi-skilled and skilled labor from outside of the project area. This project has recognized low labor influx in the project site emphasizing on hiring local laborers. Although not large, the labor influx of workers may potentially increase the demand for sex work, sexual abuse, workplace harassment and even the risk for trafficking of women. In this regard, a key concern is the potential exposure to SEA/SH and GBV both for the population and as well as various staff, in particular the female staff members, and female residents living in and around the project sites. These vulnerabilities are exacerbated for women and children from tribal and vulnerable communities as it may restrict their movement and increase their exposure to male laborers, which may lead to sexual harassment of varying degrees.
- **Risks during travelling:** Travelling by public transport in the border areas are risky, particularly when it comes to human trafficking. Women traders are more susceptible to this risk given the existing infrastructure and regulations.
- **Low awareness about GBV/SEA-SH:** There is bank financed projects with specific resource allocation on GBV for awareness raising amongst students in the curriculum and classes. However, there are no such policies that include resource allocation in the technical skill development among female traders.

There are significantly more male traders than female. Due to the constraints placed by the current COVID-19, further consultations need to be conducted to gauge SEA/SH/GBV concerns from stakeholders.

GBV/SEA-SH implications of COVID-19

The COVID-19 pandemic has spawned an unprecedented level of social and economic crisis worldwide, and more precisely on cross border trading. The pandemic is projected to reduce global GDP and international trade by at least 4.9% and 13%, respectively, in 2020¹³. In an effort to contain the spread of the virus, governments around the world imposed lockdown policies that restricted the mobility of people and goods, which impeded trade flows at local, regional and international levels. Measures like border closure and international travel restrictions have hindered global trade flows by increasing trade costs and delaying or entirely prohibiting border clearance. Though local e-commerce and online based service providers did make a place for themselves during this periods, inter-country trading remained an issue of concern. On top of these, women involved in this sector had hard time given the additional burden of maintaining their families. Ground realities like lack of mechanisms and devices, lack of technical knowledge, poor internet and broadband coverage and lack of other critical infrastructure such as an access to reliable electricity systems and coverage in many parts of the country are

¹⁰ United Nations, Office of Drugs and Crime

¹¹ Human trafficking: the role of the health care provider. *Dovydaitis T J Midwifery Womens Health*. 2010 Sep-Oct; 55(5):462-7.

¹² <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3651545/>

¹³ WTO, 2020a; IMF, 2020

some of the core issues that forced women traders to give their business a wrap. Followings are some GBV/SEA-SH implications of Covid-19:

- **Lack of technical and financial resources to maintain business:** Despite Bangladesh's microfinance revolution, women still make up only around seven percent of the country's entrepreneurs. And these entrepreneurs are mostly focused on the national market. Lack of knowledge related to financial management, limited access to IT, such as internet and laptops/tablets as well as limited technology literacy hinder women from expanding their business in size. This also mean that women and girls may not be able to easily call service providers or reach out for help in case of emergency due to lack of knowledge. Lack of resources also mean limited ability to report GBV and seek services.
- **Lack of communication modalities:** Although mobile phone ownership and access has increased particularly in low-income settings, women are still less likely than men to own a phone. Women and girls, including those with disabilities face particular risks and vulnerabilities to the use of mobile phones/internet/SMS, for which remote GBV services alone may not be able to address, especially if the solution requires physical interaction.
- **Remote capabilities of GBV service providers during emergencies:** Not all GBV service providers have the capacity or the capability to provide phone-based remote service delivery during emergencies such as the current COVID-19 pandemic, where normal life is severely impacted. This could entail a lack of hotlines, adequate call representatives to receive cases, mechanism to file and track GBV cases and status of remote delivery, distance from GBV survivors etc.
- **Cyber Crime:** Cyber violence is relevant as most project activities will be online. Thus, there are possibilities of the women being exposed to cyber-violence, harassment and bullying. This may be possible in the instance that online users are not fully aware of how to use the technology and can be guided to other platforms by perpetrators where they face cyber-violence, harassment and bullying.
- **Domestic partner violence:** Due to Covid-19, women are in a dangerous environment to begin with. However, due to widespread lockdowns resulting in prolonged time at home, loss of income and independence- they have increased risk and intensity of GBV, teen pregnancies and even early marriage. The confinement and interruption to services means that women are living with their abusers, with less capacity to report to GBV service providers and get shelter and higher impunity of perpetrators.
- **Early/forced Marriage:** COVID-19 outbreak hindering many women from pursuing their profession and education. The families might feel that marriage is the solution to young unmarried women staying at home, especially those from disadvantaged backgrounds.

Therefore, the COVID-19 implications have been considered while developing and implementing the GBV/SEA-SH Action Plan outlined here.

Annex III. Project Grievance Mechanism to address SEA/SH Allegations (this model will be further tailored to the project needs)

