



**Gender Based Violence prevention
and mitigation Action Plan for
ACReSAL**

OCTOBER, 2021



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ABBREVIATION TABLE

ACReSAL	Agro-Climatic Resilience in Semi-Arid Landscapes
CBOs	Community Based Organization
COCs	Code of Conduct
C-ESMP	Contractors Environmental and Social Management Plan
CSOs	Civil Society Organizations
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GM	Grievance Mechanism
GPN	Good Practice Note
ESIA	Environmental and Social Impact Assessment
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
FGN	Federal Government of Nigeria
IDPs	Internally displaced persons
FGM	Female Genital Mutilation
FPMU	Federal Project Management
LMP	Labour Management Plan
NGO	Non-Governmental Organization
PMU	Project Management Unit
TPM	Third Party Monitoring
TORs	Terms of Reference
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SPIUs	State Project Implementation Units
SPD	Standard Procurement Document
VAPP	Violence Against Persons Prohibition
WB	The World Bank

1.0 INTRODUCTION

Nigeria is one of the African countries plagued with rising cases of Gender-Based Violence. This rise of GBV is increasingly violating capacity for the fulfillments and protection of citizen's fundamental human rights. GBV's increasing incidences, patterns and persistence are rooted in the series of gender inequality practices linked to social norms and power dynamics. Women and girls are the most vulnerable and affected.

Sexual Exploitation and Abuse, sexual exploitation means 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, while sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Harassment is defined as any inappropriate and unwelcome behaviour by an individual or group of individuals that is directed at and offensive to another person and that the individual(s) knew, or reasonably should have known, would cause offense or harm to that person. And, sexual harassment is any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that could reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. ¹

As a global problem that must be addressed, the World Bank projects are capable of exacerbating GBV risk if no appropriate GBV Mitigatory measures are not in place GBV has a significant negative impact on individuals, households, and communities. This action plan is articulated to focus on the prevention and mitigation of GBV within communities where the ACREsAL project is implemented. It seeks to ensure full compliance with WB ESF requirements.

1.1 Situational Analysis

GBV is a global public health problem that poses challenges in human health, with a higher prevalence in developing countries. (International Journal on environmental and public health) It is estimated that one in three women experience either physical or sexual intimate partner violence or non-partner sexual violence in their lifetime. In Nigeria, a third of women and girls (30 percent) age 15-49 reported having ever experienced physical or sexual violence by any perpetrator.

¹ Prevention and response against Sexual Exploitation and Abuse and Sexual Harassment Action Plan FAO Nigeria 2018-2019 July 2018

https://reliefweb.int/sites/reliefweb.int/files/resources/fao_nigeria_prevention_and_response_against_GBV_and_sh_action_plan_cleared_11072018_.pdf

The prevalence of child marriage is high as almost half of the girls (48 percent) are married off before their 18th birthday, and 22 percent are married before they turn 15. Forty-six percent of women justify wife-beating for at least one reason. Almost of half (45 percent) of women who have experienced physical or sexual violence perpetrated by a partner or a non-partner perpetrator, almost half (45 percent) have never sought help nor told anyone about it.

Nigeria ranks 118 out of 134 countries on the Gender Equality Index. Women’s disadvantaged position and lack of decision-making power in the social, economic and political spheres are reflected in policies, laws and resource allocation that thwart progress towards gender equality in the country.

More than 70 percent of women are impoverished and the maternal mortality rate is among the highest in the world at 576 per 100,000. Girl child enrollment in school lags behind boys’ and represents about one quarter to one-third of classroom participants depending on the state; and

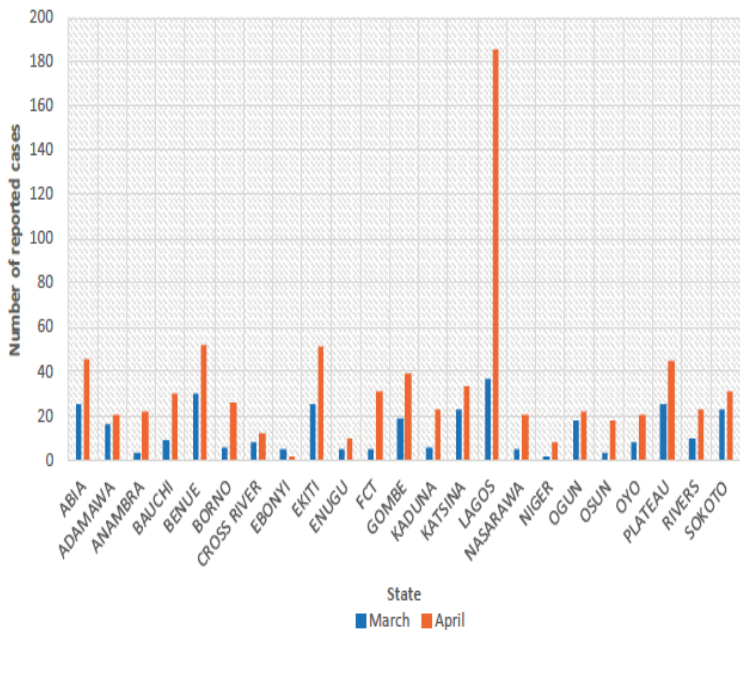


Figure 1 23 states affected by COVID19 with increased cases of GBV

in the number of telephone calls received through their hotlines in one month. In particular, service providers have reported sharp increases in cases of intimate partner violence and domestic violence. Other states have implemented similar lockdown measures, resulting in the increased incidence of GBV (Figure 1).

two-thirds of the 10.5 million out-of-school children, are girls. Harmful practices and norms such as child marriage are prevalent in Nigeria, with 43 percent of girls married off before the age of 18, while 20 per cent of women aged 15 to 49 have undergone some form of Female Genital Mutilation. Insurgency and protracted conflict have only served to exacerbate the occurrence of GBV in the North East.

The situation in Nigeria reflects the global trend of increased gender-based violence occasioned by the pandemic. GBV is reported to have significantly increased since the lockdown began in the three most affected areas (Lagos State, FCT and Ogun State) on 30 March 2020. The Lagos State Domestic and Sexual Violence Response Team reported a three-fold increase

GBV risk have been elevated by the COVID-19 pandemic, with widespread evidence that GBV has sharply increased since the beginning of the pandemic.²

1.2 Project Overview

Northern Nigeria faces rapid desert encroachment affecting the nineteen Northern States at rates ranging from moderate to severe. It is believed that desertification has affected the majority of the landmass in Bauchi, Borno, Gombe, Jigawa, Kano, Katsina, Kebbi, Sokoto, Yobe, and Zamfara States while the cushion states (Federal Capital Territory, Benue, Nasarawa, Kogi, Plateau, Adamawa, Taraba, Niger, Kwara and Kaduna states) are under severe ecological pressure from migrating human and livestock populations from neighboring states. This also threatens desertification in these states. Both drought and desertification impact directly or indirectly all aspects of human life and the environment.

The two main causes of desertification and drought are direct human activities and physical factors such as climate change. Over time, the Federal and State Governments have made several attempts to put in place control measures aimed at reducing desertification as well as commit funds to these efforts. Such measures include programs, which are aimed at encouraging farmers to use enhanced control measures such as seed resistance to drought, reforestation, and implementing water management projects such as dams to give sufficient water for all users including livestock.

Although many of these efforts initiated by the government have yielded significant results, several under the Great Green Wall Sahel-wide initiative of the African Union, there is still a need to create a large scale sustainable natural resources management initiative to address land degradation which has led to desertification, drought and scaling up of cost-effective land restoration practices. Thus, the Federal Government of Nigeria has now requested the assistance of the World Bank in addressing this problem of desertification and drought in northern Nigeria.

In light of the foregoing, the Federal Government of Nigeria has, with the support of the World Bank, initiated the preparation of a large-scale investment operation, the Agro-Climatic Resilience in Semi-Arid Landscapes (ACReSAL). This multi-sector project aims to help develop a more integrated, spatial approach to build community resilience as well as improve the sustainable productivity of its natural resources.

The Agro-Climatic Resilience in Semi-Arid Landscapes Project currently under preparation aims to increase the adoption of climate-resilient landscape management practices and enhance livelihoods in targeted arid/semi-arid watersheds in Northern Nigeria. The project is divided into four components:

² https://nigeria.un.org/sites/default/files/2020-05/Gender%20Based%20Violence%20in%20Nigeria%20During%20COVID%2019%20Crisis_The%20Shadow%20Pandemic.pdf

Component A. Dryland Watershed Management: This component aims to address the drivers of watershed degradation in the targeted areas of northern Nigeria. It will support the following sub-components: watershed, watershed infrastructure and special ecosystem.

Component B. Community Climate Resilience: This Component seeks to improve agro-climatic resilience at the community level in targeted micro watersheds. It will support the following sub-components: Community investment, community technologies.

Component C. Institutional Strengthening & Project Management: This Component aims to improve the enabling institutional and policy foundation for multi-sectoral integrated landscape management as well as support project management. This will include the following sub-components: institutional and policy strengthening, project management.

Component D. Contingency Emergency Response: This is a component that could be used as necessary to provide immediate support to an eligible crisis or emergency.

Project activities will include civil works, climate-resilient and vegetative interventions, soil conservation works and green infrastructure such as gully plugging, construction and rehabilitation of small-medium sized dams, contour ripping, water weirs and drains for improved floodwater management. Climate-smart activities such as restoration and management of riverbanks; reforestation and promotion of agroforestry; improved livestock management; improved water harvesting and water storage in ponds; irrigation technologies; and energy-efficient storage, transportation, handling, and processing facilities.

Noteworthy, the project is expected to result in positive socio-economic benefits for beneficiaries. The ACREsAL Project will support activities to develop multi-sectoral approaches for desertification control and landscape management, improve community livelihoods and resilience, and strengthen institutions. These interventions will improve land use planning and help a wide range of communities adapt to evolving dryland conditions. Communities and households that are most dependent on natural resources for their survival and vulnerable to desertification are expected to most benefit from ACREsAL. However, there are inherent significant social risks associated with the project such as land access rights of individuals, community groups, and vulnerable or minority groups being affected, and complex involuntary resettlement or land acquisition may also occur on the ACREsAL project through component A and B meant to specifically provide targeted interventions like livelihood and other interventions to vulnerable and marginalized groups, including women, youth, the elderly, persons with disabilities, internally displaced people, and ethnic and religious minorities but are also faced with the potential risk of exclusion in the proposed area of intervention.

Moderate Civil work infrastructural interventions which are also part of the project activities could have significant labour requirements and so there will be a potential risk of labour management and working conditions, including risk to community health and safety.

The project's activities also have the potential to increase GBV risks, specifically SEA/SH risks, in part due to the significant GBV levels existing in the Nigerian context. The Project will be implemented in the northeastern part of the country, in a conflict area with large populations of internally displaced persons (IDPs), increasing risk levels for SEA/SH even further. Moderate

level of labor influx, as well as work in rural and difficult-to-supervise areas, all contributes to increased risk.

1.3 Highlights of Key Issues of GBV

Gender-Based Violence (GBV), is one of the most oppressive forms of gender inequality, posing a fundamental barrier to the equal participation of women and men in social, economic, and political spheres. GBV affects both men and women, but women are much more vulnerable because violence reflects and reinforces existing gender inequalities.

Gender-Based Violence (GBV) is a common social problem in Nigeria especially in the Northern parts of Nigeria. There has been an increase in cases of domestic violence, sexual exploitation, forced early marriage, and rape of minors since the spate of Boko Haram insurgency.

Nigeria has experienced persistent armed conflicts and criminalities in recent decades, resulting in a dramatic increase in the number of IDPs streaming into different parts of northern states from the Boko Haram ravaged northeast. The disruption in the socio-economic lives of women and girls in this region places them at a high risk of all forms of abuse from the insurgents, the security agents and other members of the community.

Apart from the influx of the IDPs into the northwest geopolitical zone of Nigeria, the zone has continued to witness peace and security challenges relating to armed banditry, farmer-herder conflicts, sectarian violence and terrorists' attacks. Notably, while insurgency continues to thrive, delivering protection and support for women and girls has been an ongoing challenge in the humanitarian response, since social structures and support systems are broken down. Moreover, the advent of Covid-19 has also impacted negatively in the northern region. Ranging from tensions in families, stress and depression, increased poverty and the dire need to survive, they have all resulted in underage girls being forced by their guardians and even parents to pay the price for the family; in situations where the girls then return bearing foodstuffs, money, and other supplies from which they benefit. The vulnerable groups are not spared from the harsh reality of slipping from poverty to extreme poverty. Unaccompanied girls and adolescents, single heads of households, child mothers, child spouses, women and girls living with disabilities because of socio-economic difficulties, will do anything to earn a living hence are potential victims for sexual exploitation, survival sex, transactional sex, human trafficking, forced and child marriage. Therefore, social protection and well-being must be seen from a perspective of universalism that is sensitive to difference.

Using the GBV Risk Assessment Tool, the GBV risks on the project is rated as substantial. Anticipated risk factors in the ACREsAL project include; child labour and labour influx; insecurity challenge; lack of capacity of institutions to handle GBV issues; increase in sexual exploitation and abuse; high poverty incidence; and women's potential exclusion from ACREsAL projects due to cultural barriers and religion.

Before now, existing gender-based violence issues found in the northern parts of Nigeria range from early and forced marriages, female genital mutilation, gender inequality and male dominance in households resulting to physical, mental and sexual assaults (rape, coercion and human trafficking). Despite the heightened poverty, illiteracy, unemployment, insecurity and now, blatant abuse of health and reproductive rights of women and girls in the region, gender-based violence continues to increase and remains underreported because of strict gender norms, culture, social stigmatization, religious beliefs, ignorance/illiteracy and lack of capacity of institutions to handle the issue.

Nigeria is one of the most populated countries in Africa with a fairly large number of women illiterates particularly in the northern part of the country. Education's relevance to social and economic development cannot be overemphasized. It improves capabilities and is strongly associated with various socioeconomic variables such as lifestyle, income, and fertility rate for both individuals and societies.

More importantly, in the past, one major factor amongst many militating against girl child education is cultural biases. Strong cultural expectations dictate that women ascribe to certain gender roles. For example, they are not allowed to participate in certain physical activities, meetings, livelihoods etc; all of which reduces their right to make decisions. Notably, the Demographic Health Survey 2018 (DHS) report showed that women's participation in decision making increases with increasing education and wealth.

In 2003, Nigeria passed a Child's Rights Act that was designed to incorporate into its laws all the rights guaranteed in the United Nations Convention on the Rights of the Child. Though the U.N. convention was signed and ratified by Nigeria as a nation and its provisions incorporated into federal law, all but one of the states that have not incorporated the U.N. convention into its local laws are in northern Nigeria, where child labour is common. Also, laws against gender-based violence such as the Violence Against Persons Prohibition (VAPP) Acts have not been passed by most of the Northern states hence weak legal sanctions for perpetrators is a challenge.

The prevalence of child labour is a major concern as child-headed households and orphans have increased over time. The presence of Alimajiri and out of school children also poses a greater risk for child labour on bank projects mainly because "Those subjected to child labour are under the control and mercy of their masters as they rarely have access to education and are subjected to physical, sexual and psychological abuse. Also, sex for trade is not ruled out for the underage girls by their guardians and even parents, where the girls then return bearing foodstuff, money, and other supplies from which they benefit. Other project risks factor for SEA/SH includes the use of security agency and lack of capacity for ACREsAL to effectively address GBV risks on the project. Due to ongoing insecurity challenges in the ACREsAL States, projects would result to engaging security forces to provide protection. Project contracting a security agency creates a very risky power differential where armed personnel can engage in harmful behaviour to exploit women and children.

GBV ACTION PLAN FOR ACRoSAL

Activity/Measures	Description of Activity	Responsible Party	Budget Source of funds	Timing for Action	Monitoring Responsibility	Comments
<p align="center">1. Preliminary Actions and Documentation of Risks and Mitigation Measures</p>						
<p>Project social assessment to include assessment of the underlying GBV risks and social situation, using the GBV risk assessment tool</p>						
<p>I. Hire a GBV Consultant</p> <p>II. Each State will also be required to have their GBV specialist / officer</p>	<p>Currently, the FPMU have Social and Environmental safeguard officers along with other technical Assistant support staff but needs to hire a GBV Consultant.</p> <p>Roles for the GBV consultant include</p> <ul style="list-style-type: none"> • Sensitizing the FPMU, SPIUs, community members, contractors, consultants • Support the SPIU on all aspects of GBV/SEA risk identification, mitigation and 	<p>Safeguards unit to prepare the TORs for hiring.</p>	<p>ACReSAL Project is meant to last for 6 years. A contract for 1 year which can be renewed is feasible based on 15 working days in a month.</p> <p>1day=120,000 15 days x 120,000=1,800,000</p>	<p>Draft TOR ready for submission and hire between 1st October-February 2022</p>	<p>Project Coordinator</p>	<ul style="list-style-type: none"> • Revise ToRs for GBV Consultant • WB review and approve

	<p>management under ACRoSAL including any GBV/SEA reporting requirements</p> <ul style="list-style-type: none"> • Coordinate, support and manage the coherent and effective implementation of SEA/SH Action Plan • Review from a GBV/SEA point of view any safeguards documents prepared by consultant ensuring GBV/SEA risks are correctly identified, mitigated and managed appropriately 		<p>1year=21,600,000 6 years=129,600,000</p>			
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	<p>Develop a detailed protocol for handling cases;</p> <ul style="list-style-type: none"> • Investigation and response of GBV Complaints • Informal and formal procedure and legal handling of grievances • Communication channels and method • Project level incidence response 					
II. Hire NGO that would work with existing structures in the States.	<p>The contracted NGO would be responsible for:</p> <p>Risk Assessment Service Provider Mapping GRM Management Community sensitizations Capacity building of service providers</p>	PMU	For 6 years 800,000,000	15th December 2021-30 th February 2022	Project Coordinator	<ul style="list-style-type: none"> • Revise ToRs for Firm • WB review and approve

<p>V. GBV Service Provider Mapping and Development of a Referral Pathway</p>	<ul style="list-style-type: none"> • Map GBV prevention and response actors including service providers), and the linkages among local response providers (local referral pathway) • Identify key Stakeholders along the project route and Conduct Stakeholder Consultation meetings to get information relating to service providers • Utilizing available data collection tool. • Assess and analyze the quality of services been provided by the Service Provider 	<p>The Hired firm.</p>	<p>Hired Firm Contract</p>	<p>To commence January 2022</p>	<p>Project Coordinator Social Safeguards.</p>	<ul style="list-style-type: none"> • Review the ToRs • Possibly scope out some partners <p>Review the technical proposal of the firm and provide feedback to the report</p>
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	Develop a referral pathway with quality service providers					
V. Assess and strengthen the FPMU and SPMU capacity to address SEA/SH risks	<ul style="list-style-type: none"> Sensitize the FPMU and SPMU on the importance of addressing SEA/SH in various project planning phases. Conduct GBV (Strength, Weakness, Opportunities, Threats) SWOT Analysis among Staff within the Social Safeguards and Environmental Departments. Identify and conduct general and specific GBV-SEA/SH trainings and development based on Staff duty and responsibilities. 	GBV Consultant GBV (SEA/SH) training and other capacity building activities from the World Bank, and/or external Consultants on GBV (SEA/SH) is highly recommended	ACReSAL 400,000,000	The capacity building process will be a continuous exercise, but the targeted timeframe proposed for this action to commence is January 2022	Project Coordinator	Reports

	<ul style="list-style-type: none"> • Training for supervision consultants, Environmental and Social safeguards, communication specialists, monitoring and evaluation officers, procurement officers 					
<p>71. Site-specific GBV consultations to take place with local stakeholders including women's groups at the soonest possible date. Include GBV issues in the existing public consultation plan</p>	<p>Focused group discussion with women and young girls, people with disabilities, held in safe spaces, with same-sex facilitators trained in survivor-centered response, to understand their concerns related to the project. Consultations will also help to determine the safest most appropriate reporting channels wherewith they are comfortable in laying their grievances.</p>	<p>GBV Consultant /Expert Advisor and Safeguards Experts</p>	<p>ACReSAL 300,000,000</p>	<p>January 2022</p>	<p>Social Specialist Monitoring and Evaluation officer</p>	<p>As part of the stakeholder consultations, those affected by the project should be properly informed of GBV risks and project activities to get their feedback on project design and safeguard issues</p>

II. Integrate consultation information on GBV and gender equality into GBV Risk Assessment, use updated rating to assess GBV issues in operations, project implementation and institutional capacity	Desk review + focus groups and in-depth interviews to understand specific SEA/SH risks in the different project areas	GBV Consultant	Consultant contract	January 2022	FPMU SPMU	Management will provide input and monitor finalization
2. Separate GBV sensitive channels for reporting in GRM (Substantial Risk)						
i. Develop a detailed protocol for handling cases	<ul style="list-style-type: none"> • The GRM would have specific procedures for GBV cases, confidentiality with safe and ethical documenting • Investigation and response of GBV Complaints • Informal and formal procedure and legal handling of grievances • Communication channels and method 	GBV Consultant	Consultant Contract	March 15 th - April 15 th 2022	FPMU WB	<ul style="list-style-type: none"> • WB to review and provide technical guidance

	<ul style="list-style-type: none"> • Project level incidence response 					
ii. Training GBV sensitive Channels for reporting in GRM	<ul style="list-style-type: none"> • NGO to revise GRM procedures • NGO to develop training curriculum for GBV sensitive approach and Training for GRM operators and community focal points • Include Survivor-Centered GBV protocols in the GRM guidelines • Monitor implementation of GRM protocols to address GBV complaint • Conduct refresher trainings on GBV and GRM. 	SPMU NGO	200,000,000 (SPMU only). NGO expenses would be under agreed contract	To commence from 15 th April- 30 th April 2022	SPMU FPMU WB	<ul style="list-style-type: none"> • WB to review and provide technical guidance. This can be done in tandem with or after GRM has been set up • WB to provide feedback on curricula and review training report
3. Inform project-affected communities about GBV risks						

<p>i. Inform project-affected communities about GBV risks</p>	<ul style="list-style-type: none"> • Conduct Focus group discussion/meetings/general consultations • Undertake regular M&E of progress on SEA and SH prevention and response activities • Develop a communications strategy to integrate GBV awareness-raising activities to affected communities (hold regular refreshers every six months) • Conduct sensitization for project affected communities about GBV risks and provide information on how to report incidents to the project GRM and 	<p>Communication Officers, NGO, GBV Consultant</p>	<p>ACReSAL 300,000,000</p>	<p>To commence from 15th May 2022</p>	<p>SPMU NGO FPMU WB</p>	<ul style="list-style-type: none"> • WB to provide review and feedback from a GBV lens. This would build on existing communication activities (a show during radio programs-focused on community GBV risks associated with project implementation, etc.). This activity will increase awareness on GBV and produce a clear stakeholder plan for engagement
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	what to expect in terms of process and outcomes if an incident is reported					
ii.	Reflect GBV messages in stakeholders engagement plan activities	<ul style="list-style-type: none"> Ensure that the ESMP include a Stakeholder Engagement Plan that meets the requirement in the ESS-10. 	Communication Officers, NGO, GBV Consultant /Contractor	ACReSAL/Contractor's contract	Before site works commence	Social specialist, GBV Consultant would monitor issues of non-compliance
iii.	Reflect mitigation measures in key safeguards instruments (project ESIA, ESMP, C-ESMP, LMP) for ACReSAL including GBV Accountability and response framework	<ul style="list-style-type: none"> Ensure that GBV (SEA and SH) risks are adequately reflected in all Environmental and Social project documentation. Particularly, the ESMP and the c-ESMP Develop a GBV (SEA/SH) Action Plan including an Accountability and Response Framework as part of the ESMP. 	Environmental and Social Safeguards, GBV Consultant, Procurement officer.	N/A	Submission for the SEA/SH Action Plan is ongoing. <i>However, other safeguard instruments (ESIA and ESMP) are yet to be developed since specific sites are not known. Tentatively Q2,2022</i>	<ul style="list-style-type: none"> Safeguards and GBV Consultant will ensure SEA / SH risk are adequately addressed in all relevant documents. Documents to be reviewed and approved by SPMUs, FPMU, and WB

4. Contractor Obligations						
i. Define SEA/SH requirements in bidding documents	<ul style="list-style-type: none"> Clearly define the SEA and SH requirements and expectations in the bidding documents for both contractor and consultant Based on the project's needs, define the requirements to be included in the bidding documents for a Code of Conduct that addresses SEA and SH. Consider integrating the International Competitive Bidding (ICB) SPD requirements for addressing SEA/SH risks. Set out clearly in the procurement 	Procurement Officer and GBV Consultant	N/A	Starts at project effectiveness Q2, 2022	PMU Procurement Unit and Safeguards Officers	Correspondence

	<p>documents how adequate SEA and SH-related costs will be paid for in the contract.</p> <ul style="list-style-type: none"> Clearly explain and define the requirements of the bidders' Code of Conduct to bidders before submission of the bids. Ensure that the C-ESMP requirements in the contract document meets the project's SEA/SH prevention and response 						
ii.	<p>Reflect SEA/SH risks and mitigation in contractor's ESMP (C-ESMP) or other safeguards plans,</p>	<ul style="list-style-type: none"> Ensure that GBV - SEA/SH requirements are prioritized in the C-ESMP. Monitor the C-ESMP for GBV-SEA/SH compliance in 	Contractor	N/A	Upon the Submission of documents	SPMU, Safeguards Units and GBV Consultant	Correspondence

including budget	<p>accordance with the contract</p> <ul style="list-style-type: none"> Review project-related ESMP (C-ESMP) to verify that appropriate mitigation actions are included. Review the various GM's Structures and operating system 					
<p>iii. Ensure workers sign and understand Codes of Conduct and are trained on GBV and SEA/SH</p>	<ul style="list-style-type: none"> Ensure that every worker signs the CoCs. Ensure requirements in the Code of Conduct-CoCs are clearly understood by those workers signing. Conduct Awareness, sensitization, and training on GBV and SEA/SH 	Contractor and Independent Consultant	Contractor's contract	The contractor will be required to ensure signing by all new staff and will conduct monthly refresher/tool box training. This process will begin well site work commences.	SPMU, Safeguard Units and GBV Consultant	Code of conduct would be well explained with English and Local dialect to ensure they understand the reason and importance of the CoCs, roles and responsibilities . Training would include what is GBV, SEA, SH?

	<ul style="list-style-type: none"> • Conduct regular site visitation and meeting • Awarding and certification of staff based on attitude and performance on GBV and SEA/SH • Disseminate CoCs (including visual illustrations) and discuss with employees and local communities 					<p>How can the project exacerbate GBV risks, roles and responsibilities of actors involved in the projects, GBV incident reporting mechanism, accountability structures and referral procedures. Total numbers of employees who signed the CoCs and numbers of outstanding if any would be recorded.</p> <p>Managers CoCs Company CoCs</p>
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						Individual CoCs	
iv.	Implement worksite mitigation measures, including separate sanitary facilities for men/women and visible GBV prohibitions	<ul style="list-style-type: none"> • Ensure separate shower and toilet facilities for males and females are available and have locks, appropriate lighting, and other safety considerations • Monitoring should ensure that these are adequate for staffing and are operational • Construct a separate living quarter for females exclusively • ACRoSAL States will have GBV free signage at 	Supervision Consultant, Contractor	Contractor's contract	Before contractors moves to sites	SPMU, Safeguards Unit, FPMU and GBV Consultant.	FPMU, SPIU and WB will supervise and monitor this activity

	<ul style="list-style-type: none"> facilities in local languages Negotiations/discussion with contractors for inclusion of these aspects 					
Total			₦2,129,600,000			
Contingency - 15%			319,440,000			
CBN Rate (409.18)	TOTAL		₦2,449,040,000	\$ 5,987,873		
Estimated budget for 6years			00			

3.0 ACCOUNTABILITY AND RESPONSE FRAMEWORK

Introduction

3.1 Purpose of Accountability and Response Framework

This Accountability and Response Framework provides details on how incidents will be handled, should they arise, investigation procedures, timeframe and the range of possible disciplinary actions for violation of the Code of Conduct by workers. This is because contractors have a contractual duty to hold workers accountable for the Code of Conduct and enforce disciplinary measures. This Draft Accountability and Response Framework which includes a SEA/SH Action Plan will be finalized with the contractor's input and included in the Contractors-ESMP (c-ESMP).

The framework is also meant to give procedures in reporting SEA/SH allegations internally for case accountability, a referral pathway to refer survivors to appropriate support services, and procedures that clearly lay out confidentiality requirements for dealing with cases.

3.1.2 Why are GBV, SEA and SH allegations different from other grievances?

The ACREsAL SEA/SH allegations will be addressed differently from other project-related grievances, even though the cases may be initially received by the same Grievance Redress Mechanism Committee. The survivor-centered approach will be used because of the risk of stigma, reprisals, and rejection associated with sexual exploitation and abuse and sexual harassment that the survivor is faced with. Based on research that highlights the chronic under-reporting of SEA/SH, adopting a community-based approach by consulting with women and young girls adds efficiency to the reporting mechanism by incorporating local solutions into the overall system. Notably, the beneficiaries are the ones to make use of the GRM. Hence, they are in the best place to provide channels that work for them. In particular, because they are aware of their terrain, the types of GBV violence that exist, the power imbalance between men and women, and the culture and traditional norms that affect women and girls, especially when it comes to repercussions tied to speaking up.

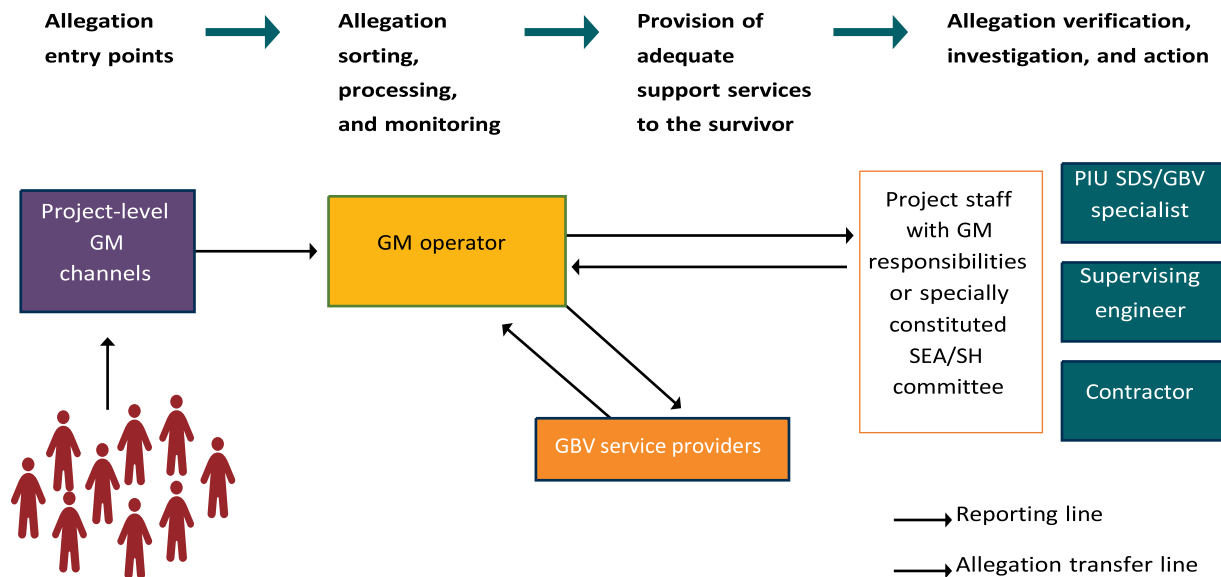
Ensuring participation, not just consultation with women and girls would not only help in revealing their preference for GRM Channels which they trust or feel comfortable using, but would also bring the added value of community members taking ownership of the project, thereby reducing the occurrence of SEA/SH in bank projects

The SEA/SH Grievance Mechanism will put in place channels for registering, recording, and handling such cases in a safely and confidentially. In addressing SEA/SH risks, ACREsAL will use the three key guiding principles (confidentiality, informed consent, and survivor safety) of the survivor-centered approach to systematically and adequately respond to the specific nature of SEA/SH cases.

3.1.3 Updating and finalizing the A & R Framework using Model # 2 of the SEA/SH GM.

In updating and finalizing the A & R Framework in consultation with the contractor, GBV Consultant and NGO. The ACREsAL FPMU has planned to use Model-#2 of the SEA/SH GM,

which links the project grievance mechanism to an existing intermediary/service provider to handle SEA/SH allegations.



Under model 2, an existing intermediary (NGO) is identified and tasked with promptly addressing SEA/SH allegations. The intermediary is selected by the project implementation unit in consultation with the World Bank based on its qualifications to receive and respond to potential SEA/SH allegations in terms of experience, quality of service provision, outreach, and relationships with other GBV service providers.

SEA/SH allegations can be reported under model 2 either through project-level GM channels (GRM Operator, Contractor, telephone, text messages) or directly through the intermediary. If a SEA/SH allegation report is received through the formal grievance mechanism, the GM operator refers the matter to the intermediary. The intermediary will provide immediate support services in its sphere of competencies, such as health or psychological support, and then refer the survivor to other relevant GBV service providers and coordinate with the project GM operator on the survivor’s behalf with the survivor’s consent. If the survivor gives consent, the second action for the GM operator is to communicate the allegation to a specially constituted SEA/SH grievance committee comprising representatives of the client, consultant, contractor, and local service providers that are charged with monitoring SEA/SH response (as seen in the above diagram). The allegation is reviewed and a determination is made regarding the likelihood of the allegation being linked to a project. If the allegation is likely to be linked to the project, the project implementation unit asks the contractor to take appropriate action against the perpetrator.

The intermediary is responsible for informing the GRM operator of all SEA/SH allegations that have been identified as originating from a project, such as those against contractors, workers, or consultants, with the consent of the survivor. In this way, the project implementation unit and the World Bank can be kept apprised and appropriate action can be taken if the alleged

perpetrator is linked to project activities and if the survivor wants to seek disciplinary action. If the SEA/SH allegation is linked to a World Bank-financed project but the survivor does not want to submit a grievance with the alleged perpetrator’s employer, the intermediary only shares information with the GRM operator about the survivor’s age, sex and the fact that he or she does not choose to proceed with accountability processes. The intermediary can be tasked with additional responsibilities to support the grievance management process, including conducting dialogue and awareness-raising activities about gender-based violence if they have the competency and skills to do so and/or monitoring other SEA/SH risk mitigation measures, such as if the codes of conduct are being developed and signed by contractors, workers, and consultants. From the FPMU, an appointed gender focal point can be tasked with remaining in constant communication with the intermediary to manage issues properly and promptly, monitor the gathered information, and report limited information to the World Bank that does not include specific information about the survivor but only that it has been referred and to whom.

3.1.3.1 SUMMARY OF RESPONSIBILITIES

N/O	ACTORS	ROLES & RESPONSIBILITIES
1.	GRM Operators	Uptake of grievances, documents and registers Informs survivor about legal and internal data sharing obligations Refer to service providers
2.	Hired NGO	Receive complaints Refer to service providers Report action taken to the GRM operator
3.	Service Providers	Provide GBV Services to survivors
4.	Engineer, contractors, supervision consultants	Implement sanctions for the perpetrator by following required reporting protocol hereby holding workers accountable to Codes of Conduct
5.	GRM Committee (Social safeguards Specialist and GBV specialist from the PIU, Supervision Consultant, member of NGO and a representative from local Ministry of Women Affairs).	Review grievances and determine if it’s project-related Report action taken to GRM Operator Monitor, track and provide regular reports to ACRE SAL FPMU Where appropriate follow up with the survivor to ensure they have received the support they needed Review lessons learned from cases on quality of mitigation and response measures and adjust interventions accordingly

3.1.4 The short-term plan for implementing this model-2 will include the following key listed activities:

- Conducting a mapping exercise in ACREsAL States.
- Developing a referral pathway consisting of service providers who meet basic quality standards.
- Hire a single NGO that coordinates services with other providers.
- Hiring the services of the NGOs or service providers through a written contract and approved Terms of Reference.
- The NGO would assist services providers in areas where there are capacity gaps and needs concerning carrying out their duties, through training with assistance from the GBV Consultant.
- Conducting consultations with women and girls in the community to better understand their preferred means of reporting as this helps to develop appropriate and functional reporting channels.
- Ensure is the project GRM is designed it would take into consideration of GBV sensitive nature.
- Development of detailed protocols for handling cases.
- Enhancing the knowledge capacity of the project level GRM, reporting channels, and service providers through training to adequately handle SEA/SH incidents.
- Ensuring that the contractor staff are oriented and trained to the Codes of Conduct.
- Ensure workers and communities are trained on GBV, the GRM, reporting channels where to report and what happens when a report is made.
- Monitoring and evaluating the outcome of the planned activities.

3.2 Guiding Principles

1. Global best practice recognizes that it is essential to respond appropriately to a survivor's complaint by respecting the survivor's choices. This means that the survivor's rights, needs and wishes are prioritized in every decision related to the incident. The survivor of GBV, particularly SEA and SH, who dares to come forward must always be treated with dignity and respect. Every effort should be made to protect the safety and wellbeing of the survivor and any action should always be taken with the survivor's informed consent. These steps serve to minimize the potential for re-traumatization and further violence against the survivor. Confidentiality is essential throughout the process. Otherwise, the survivor risks retaliation and a loss of security.
2. If the alleged perpetrator is an employee of the contractor, consultant or SPIU, according to the CoCs, sanctions would be carried out by the employer. Sanctions need to be proportional to the transgression, which may include an informal or formal warning, Additional warning, Loss of salary, suspension of employment (either administrative leave or without payment of salary) or termination of employment, referral to the police or authorities as warranted. Also, to protect the safety of the survivor, and the workplace in general, the SPIU, contractor or consultant, in consultation with the survivor – and with the support of the GBV Services

Provider—should assess the risk of ongoing abuse to the survivor and in the workplace. Reasonable adjustments should be made to the alleged perpetrator or survivor’s work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary. The employer should provide adequate leave to survivors seeking services after experiencing violence.

3. As required by the World Bank ESF, ACRoSAL SPIUs shall provide a GBV Sensitive-grievance mechanism, process, or procedure to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project, in particular about the Borrower’s environmental and social performance.
4. The GRM will be proportionate to the risks and impacts of the project. This shall include processes to refer complaints to the project GRM so as to ensure that an accurate understanding of the project’s complaints is always available. The GRM should be survivor centered not ask for personal details of survival beyond the information the survivor is willing to provide. The information in the GRM must be confidential—especially when related to the identity of the complainant.
5. Mechanisms are needed that create safe, enabling spaces for survivors to report SEA/SH incidents and that offer a safe, ethical, survivor-centered response when cases come forward. ACRoSAL SPIUs will adopt a survivor-centered response meaning that the survivor’s choices, needs, safety, and well-being remain at the center of all matters and procedures. This involves the creation of a supportive environment in which the rights of the survivor are respected and prioritized.
6. Special attention shall be paid to ensure security, confidentiality, and consent in addition to dignified and non-discriminatory treatment throughout all stages of the process. The approach will promote recovery and the ability of survivors to identify and express their needs and wishes, as well as reinforces the survivor’s capacity to make decisions about possible interventions (UNICEF 2010).
7. Guaranteeing consent throughout the grievance mechanism process is essential for SEA/ SH cases. Normal project-level grievance mechanisms do not emphasize consent. However, the GBV-grievance mechanisms for ACRoSAL states shall in addition, those dealing with SEA/SH cases receive special training so that they do not re-victimize and re-traumatize survivors that are brave enough to come forward and share their experiences, but instead can contribute to their recovery, healing, and empowerment.
8. Effective grievance mechanisms guarantee confidentiality, impartiality, and transparency; objectiveness and independence; responsiveness and efficiency; speed and proportionality; participation and social inclusion; and simplicity and accessibility. Such hallmarks also apply and need to be taken into account when designing a grievance mechanism to address sexual exploitation and abuse and sexual harassment (SEA/SH GM).
9. However, three key guiding principles must be systematically applied to adequately respond to the specific nature of SEA/SH cases: confidentiality, survivor-centricity, and survivor safety. These shall be applicable for the states GBV-GRM.

DETAILS OF THE ACRESAL SEA/SH GRIEVANCE MECHANISM

Some activities within the GBV Action Plan for ACReSAL is currently ongoing and intend to address the following;

I. Entry points for ACReSAL GRM

The assignment will obtain and/or building on information about the existing entry points where survivors feel safe and encouraged to come forward which may serve as channels for reporting (for example, women's groups, community leaders, health centers and other GBV service providers). The assignment also intends to identify other channels that can be harnessed under the project, through stakeholder consultation meetings with the existing GRMs and community dwellers. The mapping exercise discussed below will identify SEA/SH reporting entry points along the project route. The entry points to the GRM will be based on the service provider proximity and convenience to the GRM actor's residents. Several entry points will be identified along the project route where survivors can feel safe and encouraged to come forward without difficulties. Entry points under this project will include, but are not limited to, the listed below.

- Project-Level GRM Office/ designated meeting point
- Hotlines
- Contractor Office
- Consultant Office

II. The process for addressing complaints

- The GRM operator will keep GBV allegation reports confidential and, unless the complaint was received through the GBV Services Provider or other identified reporting channels, refer the survivor immediately to the GBV Services Provider.
- If a case is first received by the GBV Services Provider or through other identified reporting channels, the report will be sent to the GBV operator to ensure it is recorded in the system with the consent of the survivor.
- The GBV Services Provider provides the necessary support (medical, legal, psychosocial, security, shelter, livelihood) to the survivor until it is no longer needed.
- If requested by the ACReSAL SPIUs, a survivor's representative from the GBV Service Provider will participate in the GBV resolution mechanism, including referral to the police if necessary. The survivor must give the service provider representative consent to participate in the GBV resolution mechanism on her/his behalf.

- As part of the established resolution mechanism, GBV allegations are verified if it's related to the project or not and agreement is reached on a plan for resolution by the committee, as well as the appropriate sanctions for the perpetrator carried out by the contractor, all within the shortest timeframe possible to avoid further trauma to the survivor.
- In consultation with the GBV Services Provider, the contractor is tasked with implementing the agreed-upon plan which should always be in accordance with local legislation, the employment contract, and CoC.
- Through the GBV Services Provider, the GBV complaints resolution mechanism advises the GRM operator that the case has been resolved, and it will then be closed in the GRM.
- ACRoSAL SPIUs and the World Bank will be notified that the case is closed.

III. Information Sharing and Reporting

Information collected by the grievance mechanism shall be kept to a minimum to protect the confidentiality of the survivor. Only three elements related to a SEA/SH allegation shall be recorded:

- The allegation in the survivor's own words;
 - if the alleged perpetrator is, to the best of the survivor's knowledge, related to the project; and, if possible,
 - The age and sex of the survivor.
10. Additional information shall be gathered by the GBV service providers using their existing survivor support protocols. GBV service providers have their internal reporting and case management systems where the detailed information on the case will be stored. This information shall remain confidential and will not be part of the GRM process.
 11. It is critical that workers and communities are sensitized to the mandatory reporting laws. Also, the survivor must be informed about mandatory reporting. When it comes to certain types of GBV incidents such as sexual abuse of a minor, then the service providers, PIU representatives can carry out their legal obligation as reporting to the police. The code of conduct establishes that the age of consent for engaging in sexual activity is 18, with censure measures identified for those who do not comply. The Services Provider, and ACRoSAL SPIUs representatives involved in the GBV case resolution, need to understand their legal obligations when it comes to reporting GBV cases to the police. When there is no legal obligation to report the case according to the local law, survivors hold the decision of whether to report cases to the GRM for resolution and other service providers and reporting of a case to anyone can only be made with the consent of the survivor.
 12. The GBV-GRM shall allow for the immediate referral of survivors to GBV service providers. Within the grievance mechanism structure, the actor notified of a SEA/SH allegation shall immediately provide the survivor with information regarding options for reporting and response, including referral to existing service providers recommended from the GBV Service mapping.

13. The GBV-GRM shall provide linkages to the legal system of the country. It shall ensure due process is up to the police and the courts, not just at the grievance mechanism. It is not part of a GBV-GRM's remit to conduct investigations, make any announcements, or judge the veracity of an allegation. The GBV-GRM shall refer the case to the domestic regulatory framework to process the case if the consent of the survivor is received.
14. The GBV-GRM shall communicate mandatory reporting requirements before the filing of a formal grievance. Information on relevant legislation shall be delivered to survivors early on and before any disclosure, such as through relevant communication and awareness-raising activities or face-to-face meetings, to respect the survivor-centered approach.

In terms of individual accountability, the grievance mechanism has no authority to trigger a prosecution against an alleged perpetrator. SEA/SH allegations shall be referred to a specially constituted SEA/SH committee, which will provide their best-informed judgment on whether the allegation is likely to be linked to ACRoSAL. The judgment can then be used to assess the overall effectiveness of SEA/SH prevention measures. While the survivors hold the decision of whether to report cases to the police or not, a key element of the Coc will be applied by the contractor which includes melting out sanctions if an employee is found to breach the Code of Conducts. The codes articulate different levels of accountability and responsibility from managers, individual construction workers, the company.

IV. Operating protocol or procedures for SEA/SH GM model

Considering the GBV risks on the project, which is rated as Substantial , a Model 2 GRM system is being developed by the FPMU which will link the project grievance mechanism to an existing intermediary to handle SEA/SH allegations. This section details protocols for handling SEA/SH allegations. It shall cover what will happen if a SEA/SH allegation is raised with the GRM, how survivors will be provided with complete information about their options and referrals, and the plan for ethically collecting, sharing and storing data. This shall outline how the GRM will notify the PIU if the survivor chooses to report the allegation to the project and the contractor for potential action. This shall be in line with the World Bank Technical Note on SEA/SH Grievance Mechanism.

- **Training of SEA/SH GM actors:** Part of the scope of service for the NGOs for ACRoSAL states will be to provide all actors involved in SEA/SH GRM with specialized training and ongoing support to enable them (i) to interact with survivors in an empathetic, non-judgmental way that prioritizes confidentiality and survivor choice; and (ii) to address the allegations in line with the protocols for SEA/SH cases. The content of the training will be as prescribed in the GPN for GBV.
- **Communication Awareness Raising Strategies:** Also, part of the scope of service for the NGO for ACRoSAL also includes sensitization. This will include making communities understand (i) where to seek help and the GM channels available, (ii) what to expect if a complaint is raised, and what the GM and project will – and will not – be able to do (e.g., the project will not provide payment); and (iii) expectations for confidentiality. These

communications shall be made alongside other key GBV messages, including the requirements of Codes of Conduct and the behavioural standards they impose on project workers. This will also be included in the messages during Stakeholder Engagement activities.

- The FPMU will communicate with the community members / project beneficiaries in line with the SEA/SH Grievance Mechanism through the existing Grievance Redressed Mechanism Committees and service providers. According to the ACRoSAL Contract, the Stakeholder Engagement Plan is a requirement in the C-ESMP that will be submitted shortly by the contractor. The main entry point will be the SEA/SH GRM that will refer survivors to GBV service providers.

When an incident is raised, FPMU expects that the Grievance Redressed Mechanism Committees records the following information:

- (1) The allegation in the survivor's own words;
- (2) If the alleged perpetrator is related to the project, and the best of the survivor's knowledge; and
- (3) The age and sex of the survivor.

- **Actions the GRM will take include:**

- a. Giving information about options and potential outcomes, information on any mandatory reporting requirements in the law, etc.

- b. Referral to GBV service providers

Therefore, information on relevant legislation will be delivered to survivors early on and before any disclosure, such as; through relevant communication and awareness-raising activities or face-to-face meetings, to respect the survivor-centered approach. The documentation of information will begin with the GRM Operators. Furthermore, it is the sole responsibility of the GRM Operator to refer the allegation to a service provider which covers medical, psychosocial, legal, shelter, security or livelihood services depending on the need as required by the survivor. Also, the case is reported to the specially constituted SEA/SH committee, which will provide their best-informed judgment on whether the allegation is likely to be linked to a World-Bank financed project. Any further action will depend on the consent of the survivor and will take place outside the GRM.

- **Timeline and budgets:** The details of the time frame for finalizing the ACRoSAL GBV-GRM structure, the development of protocols, training of SEA/SH GRM actors are presented in the GBV Action Plan for ACRoSAL SPIU. The funding for this will be provided by the various ACRoSAL State governments through their counterpart fund.

3.4 Service provider referrals and resources

The Hired NGO plays a crucial role in supporting the model 2 GRM and the project in general. Responsibilities of the NGO includes conducting GBV Service mapping of competent service providers, develop a functional referral pathway, ensures coordination and refer survivors to

service providers whenever a complaint is received; and the NGO will also take other actions to support the implementation of the SEA/SH Action Plan, as outlined below.

The objective of the assignment is to carry out the mapping of formal (medical care, safe accommodation, psychosocial counselling, police protection and/or legal advice, and Livelihood support) and informal resources and/or services (community-based organizations (CBO), e.g. existing women's groups; trusted individuals, such as people who have been champions to speak out about positive male norms, and the unacceptability of SEA; religious leaders and community leaders) that SEA victims can have access in the project intervened areas. Furthermore, it intends to minimize the potential risks of SEA (and other forms of GBV by mapping the precise information on the services and referral pathway for survivors of SEA (and other forms of GBV).

In following steps listed below will be used in establishing a referral pathway to GBV service providers:

- Conducting a service providers mapping
- Assessing the data collected to see which providers meet basic quality standards with holistic and comprehensive support and services provided for survivors/victims. This will include medical care, psychosocial support, protective care, and legal services (legal advice, representation, mediation and litigation (impact litigation)
- Developing relationships and agreements with service providers to provide prompt and well-coordinated responses for survivors. Adhering to the standards of professional practices are prescribed and followed with regards to confidentiality, information sharing and recording of sensitive information, avoiding conflicts of interest.

Other duties of the NGO include;

- Raise awareness and sensitization about GBV/SEA and GRM
- Provide support to the GRM under the "model 2" approach, by delivering services within their sphere of competency and will coordinate the delivery of other services while supporting the GRM to manage SEA/SH complaints using a survivor-centered approach.
- Complaints will be given by survivors to the SEA/SH GRM Operators, Contractor or service provider based on the incident location. It is necessary to refer the case to the service provider. Hence, all actors in the GRM must be well trained on the key guiding principles for handling GBV cases.
- The successful functioning of the referral pathways and service provision will be contracted out in this case to a specialized NGO.
- Details information of the GBV-specialized NGO/service providers will be share with the SEA/SH GRM Operators and the Contractor.
- Documentation and printouts of the GM referrals pathways should be prepared in the form of a chart and distribute to managers and also be used to carry out public awareness and education.

- Print out of the GRM referral chart
- Referral pathways will be used to provide support to survivors.

Referral Protocol will be an agreement of cooperation among the respective Government Ministries, Departments, Agencies (Ministry of Gender, Children and Social Welfare, Ministry of Health, Ministry of Education, Ministry of Internal Affairs) and Non-Governmental Organizations (NGOs) /Community Based Organizations (CBOs) to ensure an effective response to, and coordination of, services for victims/ survivors of Gender Based Violence (Domestic and sexual violence).

The project's plan for hiring GBV service provider will be led by the safeguards and Environmental departments of the FPMU in consultation with the World Bank. The process will begin by conducting a mapping exercise of GBV service providers, identifying the existing GBV Service providers' centers/locations along the project route, assessing their independent capacity of the existing GBV Service provider's staff and the quality of services they provide. The project will also provide relevant trainings, if necessary, make use of the Ministry of Gender existing referral pathway

The Grievance Mechanism operators would likely make referrals to either one of the below pathways based on the proximity of the project route.

- Health Centers
- Police Stations
- Women Organizations
- NGOs, CSOs women's organizations or others that service providers provide psychosocial support, shelter, legal, livelihoods or other forms of support.

3.5 Project-level incident response (Actions by the PIU and Contractor)

The project level incident response would include safe and accessible mechanisms and procedures to report sexual exploitation and abuse are essential to encourage victims and whistleblowers to come forward. Reports of sexual exploitation and abuse will be dealt with promptly, fairly and effectively in accordance with applicable rules, directives, policies and procedures as provided by the Good Practice Note - Addressing SEA/SH in IPF Involving Major Civil Works (World Bank, 2020). The SEA/SH grievance mechanism, mapping of services to develop a referral system in place to refer survivors to services is still being developed. However, there are actions that will be taken by the PIU and the contractor if a survivor chooses to report to the project for potential action against the perpetrator. While this gives an overview, well detailed project-level incident response would be drafted by the GBV Consultant.

- Procedures for Reporting, registering, investigating and addressing GBV incidents will be fully presented in all ACREsAL states.
- The ACREsAL SPIU will set up a GBV-GRC with representation from the PIU, the contractor, the Supervision Consultant or other relevant actors (such as a GBV-specialized

NGO) to assess and respond to allegations in line with established protocols, and to ensure that CoCs are enforced.

- It is important to note that neither the GBV-GRC nor the PIU or contractor, will conduct a law enforcement investigation into an incident. It is a survivor's choice whether to report the case to the police or other justice sector actor,³ and this A&R Framework does not address or replace a law enforcement investigation or justice sector response.
- Investigations into an employee allegedly wrongful will be in line with the contractors policies and as contained in the signed Code-of-conduct for the project as well as the Nigeria labour law.
- The ACREsAL the GRM Committee will confirm the likelihood that the allegation is linked to the project, leaving the ultimate responsibility to the employer in implementing sanctions to the perpetrator.
- Where Community members, SPIU or Contractor staff members become aware of situations that may involve sexual exploitation and abuse in the ACREsAL States sub-project activities, they must report the matter promptly to the Chairperson of the GBV-GRM, by telephone or in writing, including by email. Reports may also be received anonymously or be made through staff representatives.
- Allegations of prohibited conduct should be reported promptly, as early reporting is critical to the success of any investigation and may significantly contribute to the project's ability to address abuses.

³ There are different considerations involved when the survivor is a child, in which case reporting and case management are determined by what is in the best interest of the child. Further, the laws of some jurisdictions include mandatory reporting requirements that may be applicable in some cases. Therefore, specific training will be provided to GBV-GRM members based on local law.

SAMPLE CODE OF CONDUCT
For the Prevention
OF
SEXUAL EXPLOITATION AND ABUSE / SEXUAL HARASSMENT AND
GENDER BASED VIOLENCE

INDIVIDUAL CODE OF CONDUCT

For the Prevention Gender Based Violence [GBV], Sexual Exploitation and Abuse [SEA], Sexual Harassment [SH]

I....., acknowledge that adhering to preventing gender based violence [GBV] Sexual Exploitation and Abuse [SEA], Sexual Harassment [SH] is important.

GBV/SEA/SH activities - be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities - constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV/SEA/SH will be pursued as appropriate according to applicable laws. I also acknowledge the need to maintain peaceful relationships and interactions with residents of project areas.

Specifically, I agree that while working on the project of ACRoSAL, I will:

Attend and actively partake in training courses related to HIV/AIDS, GBV/SEA/SH as requested by my employer.

1. Consent to Police background check.
2. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
3. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
4. Not engage in sexual harassment-for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behaviour (e.g. looking at someone 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.).
5. Not engage in sexual favors-for instance, making promises or favorable treatment dependent on sexual acts-or other forms of humiliating, degrading or exploitative behavior.
6. Not participate in sexual contact or activity with children-including grooming, or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
7. Unless there is the full consent¹ by all parties involved, 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" within the scope of this Code.

8. Consider reporting through the GRM or to my manager any suspected or actual GBV/SEA/SH by a fellow worker, whether employed by the Project or not, or any breaches of this Code of Conduct.

With regard to children under the age of **18**:

9. Wherever possible, ensure that another adult is present when working in the proximity of children.
10. Not invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or in physical danger.
11. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also "Use of children's images for work related purposes" below).
12. Refrain from physical punishment or discipline of children.
13. Refrain from hiring children for domestic or other labour below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
14. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank's safeguard policies on child labour and minimum age.
15. Take appropriate caution when photographing or filming children

Use of children's images for work related purposes

When photographing or filming a **child** for work related purposes, **I** must:

16. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
17. 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.
18. 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.
19. Ensure images are honest representations of the context and the facts.
20. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

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

- 1) Informal warning.
- 2) Formal warning.
- 3) Additional Training.
- 4) Termination of employment.
- 5) Report to the Police **if** warranted.

*I understand that it is my responsibility to ensure **I** will avoid actions or behaviors that could be construed as **GBV/SEA/SH**. Any such actions will be a breach of this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my*

*roles and responsibilities to prevent and respond to **GBV/SEA/SH** issues. I understand that any action inconsistent with this Individual Code of Conduct or failure to act mandated **by** this Individual Code of Conduct may result in disciplinary action and may affect my ongoing employment.*

Signature: _____

Name: _____

Title: _____

Date: _____

¹ *Consent is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given **by** children under the age of **18**, even if national legislation of the country into which the Code of Conduct is introduced has a lower age-
Mistaken belief regarding the age of the child and consent from the child is not a defense.*