

GENDER BASED VIOLENCE, SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARASSMENT PREVENTION AND RESPONSE ACTION PLAN

EDUCATION FOR HUMAN CAPITAL DEVELOPMENT PROJECT

Project Locations: Puntland, Galmudug, Hirshabelle, Banadir Administration
and Southwest State

Identified project risk level: High

I. Introduction

The right to education is central to the development objective as described in the SDGs¹. Education is seen as a powerful driver of development for reducing poverty and improving health, gender equality, peace, and stability in the world². More than two decades of conflicts have nearly destroyed the Somalia's educational system, which is characterized by insufficient numbers of qualified teachers, poor quality and inadequate resources³. The education deficit in Somalia is one of the most acute in the world.

The education project will be implemented by the Ministry of Education, Culture and Higher Education (MoECHE) in Somalia and aims to restore and create schooling opportunities in Somalia at the lower primary education level and to promote literacy and numeracy. The expected project outcomes are:

- increased number of children enrolled in lower primary school,
- increased gender parity at the targeted level and
- increase in the share of students attaining grade-level competency in key subjects.

1 Fiona et al (2012) Desk Review for Concern: Promising Practice in School Related Gender Based Violence (SRGBV) Prevention and Response Programming Globally

2 World Bank report: Poverty Reduction in Practice: How and Where We Work

3 USAID Somalia (2018): BAR AMA BARO ("TEACH OR LEARN")

Component 1 (“Systems building”) will focus on the establishment and strengthening of capacity and institutional systems through “strengthening government’s stewardship role, the establishment of a national student learning assessment system, and strengthening monitoring and evaluation.”

Component 2 will focus on the expansion of access to quality schooling for the disadvantaged. This component will look into the supply-side constraints faced by school going-age children, who do not have access to education due to a dearth of public schools or who are inhibited from enrolling in local non-state schools due to their inability to pay school fees. The aim is to provide out-of-school children from disadvantaged backgrounds with access to good quality schools by building new schools in about twenty-one districts across Somalia. Activities include constructing and furnishing schools”, recruiting teachers and financing their salaries,” school grants,” and incentivizing non-State schools to expand access to the most disadvantaged children.”

Component 3 (“Enhanced instruction quality”) will support the development of a 2-year Teachers Professional Development Program (TPDP). This program will be delivered using a blended learning approach and build the capacity of 6,000 teachers.

The project will focus on districts with low gross enrolment, part of Banaaxo and WFP cash transfer programs. Also, sign Participation Agreement stipulating that they will comply with minimum education policy conditions, including the mandatory use of the national curriculum, submission of a feasible plan to maintain the schools supported under the project, and a commitment to specified girls' enrollment targets.

This action plan details the necessary operational measures and protocols that will be put in place to address sexual exploitation and abuse (SEA) and sexual harassment (SH). It will include how to resolve any SEAH allegations that may arise. Also, procedures for preventing and responding to SEAH, how complaints of SEAH will be handled (investigation procedures), and disciplinary action for violation of the Code of Conduct (CoC) by teachers, school support staffs and construction workers.

II. Definition of Terms

The Inter-Agency Standing Committee (IASC) defines **gender-based violence (GBV)** as “an umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed (gender) differences between males and females. GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community at large. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm.

School-related gender-based violence (SRGBV) is defined as ‘any act or threat of physical, sexual or psychological violence occurring in or around schools, committed based on gender, gender stereotypes or perceived gender identity and enforced by power dynamics’

The United Nations defines “**sexual exploitation**” as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. **Sexual abuse** on the other hand is “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Sexual exploitation and abuse (SEA) is therefore a form of gender-based violence and generally refers to acts perpetrated against beneficiaries of a project by staff, contractors, consultants, workers and Partners.

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

III. Contextual GBV Risks

GBV is widespread in Somalia and considered a major obstacle to equality, peace, and development. Despite the fact that the lack of comprehensive and reliable national population based GBV prevalence data where information exists indicates it as being rampant in the lives of women and girls with some forms of GBV endemic. Sexual violence and Intimate partner violence, the most prevalent types of GBV globally, are commonplace in Somali women and girls' lives. FGM/C has in the past been near-universally practised.

Severe climatic conditions, clan and communal conflicts in Somalia continue to expose women, girls, men, and boys to gender-based violence (GBV)⁴. It is estimated that 2.6 million people

4 GBV includes a range of violations, including i) intimate partner violence; ii) non-partner sexual abuse; iii) harmful practices; iv) human trafficking and v) child sexual abuse. It is expected that the country and regional integration profiles will highlight the most prevalent forms of GBV within each country and provide considerations for how to address these risks most effectively.

remain internally displaced, either in rural areas or in informal settlements surrounding urban areas. Women and girls, who are already the most vulnerable in times of crisis, experience heightened risks and compromised capacity to protect themselves from GBV.⁵

Violence is woven into the fabric of women and children's everyday lives and takes place primarily in the home, but also in the workplace, in schools, on the streets and public spaces, and occurs irrespective of whether the country is undergoing conflict, crisis or is at peace, although the former can exacerbate violence.

Sexual violence, along with other forms of gender-based violence, is said to have become normalized in Somalia due to sustained exposure to elevated levels of sexual violence over past decades compounded by the lack of national and community-level communication, discussion and dialogue about sexual violence and other forms of GBV.⁶

Statistics from the country indicates that 14 percent of women aged 15-49 have experienced physical violence since the age of 12, while 8 percent reported they had experienced physical violence in the 12 months preceding the survey. Younger women are more likely to experience physical violence; with 16 percent of women in the 15-19 age group reporting they had experienced violence since the age of 12⁷.

School-related GBV (SRGBV) in Somalia.

SRGBV is a global phenomenon that impacts millions of children worldwide, especially girls. Globally, it is estimated to have 246 million girls and boys abused and harassed around and in schools every year. Girls particularly are vulnerable to school-related gender-based violence (SRGBV) which often stems from deeply rooted cultural beliefs and practices, power imbalances and gender norms.

SRGBV violates children's fundamental human rights and a serious barrier to learning and to educational attainment. Children have the right to be protected from all forms of violence, including in their school lives. Experiencing SRGBV can compromise children's well-being, physical and emotional health, and harm their cognitive and emotional development.

The drivers of GBV are multiple and complex, but gender discriminatory norms and unequal balance of power between girls, women, boys and men are the overarching root causes. To be able to understand the drivers of GBV in schools it is important to understand that there is no single factor that can explain why some people or groups are at higher risk of GBV than others. The

<http://www.worldbank.org/content/dam/Worldbank/document/Gender/Arango%20et%20al%202014.%20Interventions%20to%20Prevent%20or%20Reduce%20VAWG%20-%20A%20Systematic%20Review%20of%20Reviews.pdf>

5 UNFPA advocacy paper 2020.

6 International Alert/CISP (2015)

7 The Somali Health and Demographic survey 2020.

ecological framework clearly shows how interpersonal violence is the outcome of interaction between many factors at the societal, community, relationship and individual levels⁸

In Somalia, there are girls and boys who are victims of violence and ill-treatment in different forms (ill-treatment and physical and mental harm, lack of care or inadequate treatment and sexual exploitation), which takes place within school, at home, and other places in the community⁹. The school environment must be child-friendly, safe and protective, and to safeguard children from violence, while ensuring their right to education, and with strong equity and gender equality focus.

It is also important to remember that schools are not isolated from traditions, culture, norms, customary laws and governmental policies that exist in the country and the community, nor from individual experiences of students and staff both outside and inside schools and educational institutions.

If not addressed properly, schools can implicitly legitimize and reinforce harmful gender norms. Schools can normalize a violent environment both in the classroom and outside it by using authoritarian pedagogy that strengthens the unequal power balance between teachers and students, by allowing corporal punishment, and by not properly addressing sexualized bullying.

While incidence of GBV in Somalia is a significant contextual challenge, preliminary assessment of project-related SEA and SH has identified the following project-related risks that need to be addressed to mitigate GBV risks.

- There is the potential of SEAH in the recruitment of female teachers supported under the project. Sexual abuse and harassment might potentially compromise the safety and wellbeing of the teachers, students and the local communities, while adversely affecting project performance.
- Unequal gender and power relations can exacerbate the risks of GBV in schools especially where unethical teachers may take advantage of their positions and sexually exploit students.
- Curricula and teaching methods that do not equip girls and boys with key knowledge, life skills and violence prevention attitudes necessary to engage in healthy peer relationships may exacerbate gender norms that have been existent within the community.
- Lack of legislation banning all forms of violence against children, including SRGBV and comprehensive policy framework within the schools to prevent and address violence, might further increase the school environment's risks as limited or no regulations guide around the school environment.

⁸ SIDA report on GBV and Education

⁹ World Vision report on SRGBV

- Increasing the number of female teachers might interfere with the community gender norms and therefore increases the risks of violence at the household level and even in the school setting where they can be exposed to incidents of SEA and SH. For example in those situations where female teachers have less time available for traditional gender role-related duties in the household, such as childcare, there is also a risk of increased intimate partner violence (IPV) as household members push back.
- Misinformation or lack of information throughout the project's components can lead to harm and violence towards children, teachers and the communities, especially those with less agency and power. For example, children might be exploited to pay fees or give sexual favours in exchange for accessing school services. Other children, particularly those from the minority and underrepresented groups and those living with disabilities who are exempted by the project from paying the required school fees, might be pushed away from accessing basic education. Information and education dissemination activities must engage and reach out to all within society; corresponding monitoring and safeguards, such as grievance redress mechanisms, can mitigate some of this risk
- Lack of school-level capacity to prevent, identify and address SRGBV incidents, as well as an effective oversight mechanism to address School related GBV, can increase the chances of perpetrating violence between teachers and school staff with impunity. Also, lack of safe, secure and welcoming physical spaces within the educational settings.
- The exclusion from spaces of voice, agency, and decision-making for vulnerable groups can lead to further harm or marginalize them. Women, girls, and other groups with less power and status such as people with disabilities, unmarried women/girls, women and girls associated with armed groups/forces, displaced/returning individuals and families, and minority ethnic/clan groups are more likely to be invisible or hidden in community consultation and engagement processes as well as in the school environment. Additionally, in Somali society, patriarchal norms often lead women and girls – of all groups – to be left out of community discussions or have their needs and priorities silenced.
- During the design and construction of the schools – women and girls' exclusion from planning and designing spaces can result in aspects that ignore or exacerbate, women and girls' risks to GBV/SEA in schools and/of when accessing schools. For example, civil works from construction and/or rehabilitation of classrooms which could lead to land acquisition, restrictions on land use, resettlement and labor influx. In addition, the use of local labor and the reliance on community partnerships and management could lead to cases of child labor.
- Community conflict resolution approaches can lead to more harm, including against survivors who report GBV/SEA experiences: Community or local governance resolution processes might reinforce gender inequality pushing for resolutions that widen inequalities, are not survivor-centred, and may lead to impunity and more harm to a survivor (through marriage to a perpetrator, re-victimization or other consequences).

IV. Existing Risk Management Systems/Gaps

The SEAH risk management will be done at two distinct levels; in the schools within the school systems building on the existing mechanisms established under the RCRF project and with contractors implementing construction of new or renovating existing schools. The education project will therefore continue to build upon basic foundation with several measures to ensure the protection of children and communities it works with, including mechanisms to limit, report and follow up on potential cases of SEA and SH cases as outlined below:

a) Code of Conduct

Building on what has been developed under the RCRF project, recruited teachers will be required to sign the code of conduct that specifies behavioral conduct, responsibilities and penalties. The CoC will clearly outline prohibited behaviours including SEAH which is unacceptable in the school setting. The CoC sensitization for the teachers and school administration will be incorporated into GBV risk management training as well as during awareness sessions in schools.

The contractors will ensure all construction workers are informed of the CoC and have understood and signed the document to ensure SEAH free environment in and around the construction sites. Regular sessions on the CoC for workers will be conducted to serve as a compliance and as part of risk management.

It is mandatory for all contractors and the implementing agency to ensure all construction workers and teachers sign the CoC that is translated and explained to workers in languages that they understand considering the different dialects across selected districts. However, there is need to reinforce the CoC particularly training on SEAH provisions to both teacher and school support staff by the GBV advisor to be hired at the Ministry of Education with support from GBV specialist under the RCRF project.

b) Referral pathways

Help-seeking referral pathways for survivors of GBV exist in different districts. The GBV referral pathways is usually updated by the GBV sub cluster at the national level with support from their counterparts at the regional and district level. The GBV advisor to be hired at the Ministry of Education as well as the GBV service provider to be contracted with support from the GBV Specialist of the RCRF project will share information on existing services for GBV survivors to inform the project workers, teachers, students and community members on the available services such as psychosocial support, safety and security, legal and health interventions.

However, a dedicated referral process for school related violations will need to be developed by the GBV advisor from the Ministry of Education in collaboration with the school administrations and the community education committees (CECs) as well as social accountability committees

(SACS) which will be integrated into the existing referral pathways. Also, additional consideration will be put in place on how to address access to referral services if the schools are located in remote or rural areas where there will be challenges reaching minimum services such as health etc. There is also a need to develop and disseminate formal reporting procedures specific for each location by updating the GBV referral pathways in collaboration with different ministries and relevant agencies providing GBV services as well as provide relevant trainings for the project workers and inform communities on where to seek services whenever appropriate.

c) Grievance Mechanism

As a high-risk project on GBV/SEAH, however, there is a need to establish an effective GM with multiple channels to initiate a complaint of GBV/SEAH cases in all the locations as well as to identify and integrate GBV/SEAH entry points within the GM with clear procedures and tools for management of related complaints. Considerations related to SH will be integrated into any GM mechanisms developed specifically for project workers.

The project will establish Grievance Mechanism (GM) that handles complaints and feedback from all stakeholders involved in the project. This project GM will adapt learnings from other projects not only to strengthen accountability to communities but also to identify a range of issues by holding periodic team meetings to discuss any workplace concerns.

The school systems will establish dedicated GM reporting channels for SEAH and other forms of GBV-related complaints to be handled which may include email, hotlines as well as identifying school focal points from students and teachers. All the entry points to the GM will be identified in collaboration with key stakeholders. Putting up such systems will enable safe, confidential reporting and access to GBV services as needed.

The contractor will be required to establish a GM for workers to report incidents that are happening in and around the construction sites. All workers will be trained on how to raise complaints and report incidents as they occur. All GBV/SEAH incidents whether related to the project or not will have to be reported through the established GM which is also linked to the overall GBV GM.

The project will adopt a robust approach to address potential GBV risks. Relevant mitigation measures to address these risks are as follows:

A. Safe school Program (SSP):

- Define GBV requirements and expectations included in the contractual obligations as well as reinforce CoCs that addresses GBV in the project locations.
- Hire GBV Advisor to support the project implementation as well as guide the operation while continuously identifying potential risks and mitigation measures to be adopted. The GBV advisor will support the implementation of the GBV action plan on the Safe school program. The GBV Advisor will be based at the Federal level with support from Social focal points at the district level in the implementation of the action plan.
- Translate the existing CoC into simple, understandable language, and ensure teachers and school administration have signed the CoC to cultivate an environment free from GBV, SEAH.
- Develop SEAH prevention policy and response procedures that outlines key requirements for reporting cases if they arise, measures to enable safe, ethical, survivor-centered response and disciplinary processes.
- Establish a functional GM for reporting GBV/SEAH grievances within the school that is accessible for all including teachers and students.
- Train identified GM operators on how to respond to GBV/SEAH cases that come forward. This includes training on the aspects of informed consent, referrals to other services providers and documentation and reporting of the cases.
- Train all teachers and school staff to improve understanding of CoC, GBV, SEAH as well as accountability and response framework including the referral processes, responsibilities and reporting. The initial training for the project implementation unit on GBV risk management will be done as a stand-alone while refresher trainings will be integrated into other sessions to be organized for teachers and school staff.
- Identify a dedicated referral process for school related violations, relevant organizations for referrals, development of procedures and processes for referrals, development of accountability framework for handling allegations, including related to investigation (in alignment with national processes) and sanctions for potential perpetrators;
- Conduct regular assessment to understand the risks and limiting factors that female staff, students and teachers have and may experience in their working and learning environment.
- Conduct regular safety mapping with the students, teachers, community education committees and parents to identify areas within and outside the school where they feel unsafe and develop remedial actions where necessary.
- Develop materials for the students, teachers and other key stakeholders providing information, education, and communication to address equitable gender norms, discrimination, and unfair treatment.

- Provide funding to contract GBV services providers to facilitate access to timely, safe and confidential services for survivors in all project locations as well as integrating SRGBV prevention programming in schools.
- Develop monitoring and evaluation plan to monitor the implementation of the GBV action plan.

B. Construction and renovation of schools

- Social Safeguard specialist living within the targeted district will support the contractor on awareness raising, capacity building on CoC, GBV risk management as well as developing GM for construction workers and assessment during construction.
- Develop, translate into simple, understandable language, and sign the CoC for all contractors and workers to cultivate an environment free from GBV, SEA/ SH.
- Establish GBV GM channel/procedures for safe, confidential reporting of GBV incidence in a survivor centric manner that connect to the project GM.
- Train identified GM operators on how to respond to GBV/SEAH cases that come forward from the construction workers as well training them on the aspects of informed consent, referrals to other services providers and documentation and reporting of the cases.
- Inform project construction workers, municipalities and local communities about GBV risks, as part of stakeholder consultations before and during construction and renovation works.
- Develop SEAH prevention policy and response procedures that outlines key requirements for reporting cases if they arise, measures to enable safe, ethical, survivor-centered response and disciplinary processes.
- Contract an independent Third-Party Monitor (TPM) with experienced GBV staff to provide oversight support related to the project and in particular GBV/SEAH risk mitigation.
- Indicate that the project and/area is a GBV free zone as well as provide information on GBV response services (such as hotline numbers and where to seek assistance when needed).
- Provide separate sanitation facilities during works for men and women as well as for students

Action Plan

A. SAFE SCHOOL PROGRAM (SSP)						
Outputs	Activity to Address SEAH risk	Steps to be taken	Timelines	Responsible	Monitoring (Who will monitor)	Output indicators
1. Review the IA's capacity to prevent and respond to GBV/SEA	1.1. Recruit GBV Advisor with GBV/SEAH specific skills to support implementation and supervision of GBV/SEAH risk management requirements	<ul style="list-style-type: none"> Recruit GBV Advisor with GBV/SEAH skills 	Quarter 1 after contract signing	MoECHE	MoECHE	A qualified and competent GBV staff recruited
	1.2 Review existing policies and regulations on safe school programming providing a safe environment from sexual harassment and school based GBV within the Ministry	<ul style="list-style-type: none"> Identify existing policies in schools on protection and well-being of students. Written rules and regulations for all school operations Identify gaps existing in the policies Formulate recommendations as well as inputs on areas to amend 	Prior and during Quarter 1 project implementation	MoECHE	MoECHE	GBV/SEA prevention and mitigation measures addressed in policy documents

	1.3. Codes of Conduct signed and understood.	<ul style="list-style-type: none"> Review the existing CoC for provisions/clauses that guard against GBV/SEAH Identify TOTs to be trained and rolling out CoC at the district level Train and inform teachers, parents and school administration support staff and project staff on the behavior obligations and sanctions for violations under the CoCs. Have CoCs signed by the teachers, and school administration 	Prior and during Project implementation	MoECHE/ GBV Advisor/ Social Specialist /Teachers Focal Point (FP)	MoECHE	<p>Percentage of teachers that have signed a CoC</p> <p>Proportion of parents, teachers and support staff, and students who are aware of the code of conduct</p>
	1.4. Conduct GBV/SEAH orientation training for all teachers, school staff, students	<ul style="list-style-type: none"> Develop a training plan Develop training materials Identify TOTs Conduct training on GBV/SEA risks, responsibilities and legal/policy requirements 	<p>Quarter 1 after contract signing</p> <p>Retraining during Project implementation.</p>	GBV Advisor, PMU at the FGS and Social Safeguards specialist at the FMS/teachers FP	MoECHE	<p>Number of training conducted</p> <p>Percentage of students who report feeling safe and protected (defined as free of all forms of GBV) at school.</p>
	1.5. Develop and establish/review GBV/SEA response and accountability framework to	<ul style="list-style-type: none"> Develop/review SEA/GBV Allegation Procedures to report SEAH issues 	Quarter 1 after contract signing	GBV Advisor, PMU at the FGS and FMS/ Social	MoECHE	An established and functional accountability framework

	include: Allegation Procedures to report SEA/GBV incidents and internally for case accountability procedures which should clearly lay out confidentiality requirements for dealing with cases	<ul style="list-style-type: none"> Inform teachers, school management/leadership, students and the community on how to report cases of SEAH, CoC breaches to the GM, and how such cases are handled Develop accountability processes to address allegations of SEAH; disciplinary action for violation of the CoC by workers. 	Maintained throughout Project implementation.	Safeguards Specialist GBV Service Provider/ Teachers Focal points for school related Violations		
	1.6. Develop M&E plan	<ul style="list-style-type: none"> Develop a comprehensive M&E plan to monitor work plan implementation Promotion of high level commitment on monitoring the implementation of GBV action plan in order to supports efforts to provide multi-sectoral support to GBV survivors. Monitor GBV/SEAH Implementation Plan 	In Quarter 1 after contract signing Maintained throughout Project implementation.	GBV Advisor/Social safeguard Specialist at the district level	MoECHE	M&E framework in place
2. Map out GBV/SEA prevention and response service providers	2.1. Recruit and review the capacity of quality GBV service provider/s to be engaged in the project locations	<ul style="list-style-type: none"> Develop TOR for the recruitment of GBV services providers. Develop tools for assessing capacity of GBV/SEA service provider/s Contract qualified GBV service providers to facilitate access to timely, safe and confidential services for survivors as well as 	In Quarter 1 after contract signing	MoECHE	MoECHE	Number of GBV services providers contracted in different project locations

		<p>integrated SRGBV prevention programming in schools</p> <ul style="list-style-type: none"> • Sign MoU with the GBV service provider/s 				
	<p>2.2. Stakeholder consultations with the Ministry of Education, teachers, students, school administrations, Community Education committees, Parents, I/NGOS, women groups etc.</p>	<ul style="list-style-type: none"> • Develop interview/ facilitation guides • Officially inform the stakeholders on the components of the projects and project risks • Sensitize the stakeholders on GBV/SEAH risks and where to seek confidential services • Conduct regular assessment to understand the risks and limiting factors that female administration staff /teachers and students have and may experience in their working /learning environment • Prepare field visit and assessment reports 	<p>Prior to initiating project activities.</p> <p>Maintained throughout Project implementation.</p>	<p>PMU / GBV Advisor /Teachers</p> <p>Focal points /GBV service provider/ Community Education Committees (CECs) /Social Accountability Committees (SACs)</p>	<p>MoECHE</p>	<p>Number of stakeholder consultations done</p>
	<p>2.3. Develop and or/update a multisectoral GBV/SEAH help seeking referral pathway(s) and identify safe spaces to report cases of GBV)</p>	<ul style="list-style-type: none"> • On the basis of mapped GBV prevention and response service providers develop/update a GBV referral list for service providers. • Develop a dedicated referral process for school related violations and linking with the existing referral system in place 	<p>Quarter 1 and 2 after signing works contract</p> <p>Maintained throughout Project implementation.</p>	<p>GBV Service Provider, GBV Advisor and PMUs at the FGS and FMS/ Social safeguard Specialist/ Teachers</p>	<p>MoECHE in strong coordination with Ministries of Gender/Women and Human Rights and GBV Advisor</p>	<p>Referral pathway developed/updated</p> <p>Reporting mechanisms are in place and linked to support systems</p>

		<ul style="list-style-type: none"> • Develop referral protocols that outlines key requirements for reporting cases happening within the school environment if they arise and measures for safe, ethical and survivor centered responses. • Identify key gaps where remedial measures may be required particularly areas in remote/ rural areas where GBV services providers are not available or accessible. • Disseminate the referral pathway/list to stakeholders including service providers 				<p>Number/type of GBV/SEA preventive and response services available.</p> <p>No. of referrals of SEAH incidents to the project GM/ by other service providers</p>
<p>3. Inform project affected communities about GBV/SEAH risks</p>	<p>3.1. Conduct community sensitization to create safe, gender sensitive learning environment for (parents, teachers, school leadership and the students)</p>	<ul style="list-style-type: none"> • Develop school GBV/SEA sensitization program including violence prevention material and messages • Conduct sensitization with students using the developed materials on violence prevention, channels for reporting incidents on GBV and where to access support including the identified focal points for the school and the adjoining community. • Conduct safety mapping in schools with the students, teachers and parents to identify areas where they feel unsafe in 	<p>Quarter 2 of contract signing</p> <p>Maintained throughout Project implementation.</p>	<p>GBV Advisor and PMU at the FGS and FMS/ Social Safeguards Specialist</p> <p>Teachers Focal points</p> <p>CECs, SAC</p> <p>GBV Service provider, GM community focal points</p>	<p>GBV Advisor</p>	<p>Number of community meetings conducted</p> <p>Students have safe and confidential spaces to report experiences of GBV</p>

		<p>and around the school and identify recommendations actions</p> <ul style="list-style-type: none"> • Develop student led activities such as writing competition on prevention of violence in school to create positive and inclusive change for all 				
	3.2. Develop relevant IEC materials for engagements with teachers and students	<ul style="list-style-type: none"> • Develop information guide on Violence prevention in schools that addresses equitable gender norms, discrimination, and unfair treatment . • Develop relevant IEC materials translated in local languages of the project location • IEC materials to include information on GBV response services • 	<p>Quarter 2 of contract signing</p> <p>Maintained throughout Project implementation.</p>	MoECHE /GBV Advisor/ GBV Service provider in collaboration with the IA and Supervision consultant	MoECHE In coordination with PMU at the FGS /FMS and WB	No and type of GBV/SEA IEC material developed
4. GBV/SEA sensitive channels for reporting in GM	4.1. Develop/Review/ Strengthen GM for specific GBV/SEAH procedures	<ul style="list-style-type: none"> • Undertake internal review of GM for GBV/SEA mitigation • Identify and Integrate GBV/SEA entry points within the GM with clear procedures and tools for management of related complaints • Develop/review SEA/strengthen GBV Allegation Procedures to report SEAH issues 	Quarter 1 and 2 after signing of works contract	MoECHEs/ PMUs/ WB GBV Consultant / GBV Service Provider (will act as the intermediary SEAH GM)	MoECHE/ GBV Advisor	GM with GBV/SEA procedure integrated In the GM

		<ul style="list-style-type: none"> • Develop and update disclosure and reporting guidelines / protocol for GBV/ SEAH with a provision for victim protection and assistance. • Create reporting pathways that include support systems and accountability mechanisms including how to handle SEAH allegations properly • Develop simple, anonymous and confidential tracking system that GM can use to document when they observe/support and refer GBV incidents to service providers. 				
	4.2. Train GM operators on how to handles GBV/SEAH cases and referrals as defined in the referral pathway.	<ul style="list-style-type: none"> • Identify and select GBV/SEA focal persons within the GM operators • Train the GM operators on GBV/SEA basics, the referral pathway, reporting and Confidentiality of data 	<p>During Quarter 1 following signing of the works contract</p> <p>Retraining during project implementation.</p>	GBV Advisor/ GBV Consultant WB	MoECHE/ GBV consultant WB	No. of GRC trained
	4.3. Disseminate information on GBV GM reporting procedures	<ul style="list-style-type: none"> • Inform employees and the community on how to report cases of SEAH, CoC breaches to the GM, and how such cases are handled • 	Throughout the project	PMUs/ GBV Advisor GBV focal point / Social Accountabilit	MoECHE	No of sessions held with employees on reporting

				Y Committees		
	4.4. Review GM reports/logs for GBV/SEA sensitivity	<ul style="list-style-type: none"> Review logs for GBV/SEA documentation to ensure it follows standards for documenting GBV/SEA cases 	During project implementation.	MoECHE	MoECHE	Number of GBV/SEA cases documented
5. Separate toilet facilities for men and women and boys and girls in schools	5.1. Provide separate sanitation facilities for men and women as well as girls and boys in schools	<ul style="list-style-type: none"> Provide separate facilities Install signage on the facilities availability and usability of separate sanitary facilities. 	During project implementation.	MoECHE	MoECHE	Separate sanitation facilities for girls and boys in schools

Construction:

Outputs	Activity to Address SEAH risk	Steps to be taken	Timelines	Responsible	Monitoring (Who will monitor)	Output indicators
1. Define and reinforce GBV/SEAH requirements in procurement processes and contracts	1.1 Incorporate GBV/SEAH Requirements and expectations in the contractor and	Ensure that GBV/SEAH issues are incorporated in all contracts, evaluated as part of bidding process, and signed by contractors and consultant	Before project activities begin	MoECHE/ Contractor	MoECHE	GBV/SEAH standards in procurement/contract document

	consultants' contracts.					
	1.2 Allocation of funds for GBV/SEAH related costs in procurement documents.	<ul style="list-style-type: none"> Clearly define SEAH requirements and expectations in the bidding documents; ensure evaluation of SEAH criteria as part of review of bidding documents. 	During preparation of bid and Contract documents	MoECHE/ Contractor	MoECHE/ World Bank	<p>Bid documents with clearly defined SEAH requirements</p> <p>Contract documents with clearly defined SEAH clauses/requirements</p>

2. Review the contractors capacity to prevent and respond to GBV/SEA	2.1. Codes of Conduct signed and understood.	<ul style="list-style-type: none"> • Develop CoC for construction workers and include provisions/clauses that guard against GBV/SEAH • Have CoCs signed by the construction workers and • Train and inform construction workers on the behavior obligations and sanctions for violations under the CoCs. • CoCs (including visual illustrations) is displayed within the construction sites 	During Project implementation	GBV Specialist/Social Safeguards Specialist/Supervising Contractor	TPM, MoECHE	Percentage of construction workers that have attended CoC training.
	2.2. Conduct GBV/SEAH orientation training and sensitization for all construction workers	<ul style="list-style-type: none"> • Develop a training plan • Develop training materials • Conduct training for construction workers and the adjoining community 	Quarter 1 after contract signing Retraining during Project implementation.	Social Safeguard specialist	MoECHE, TPM	Number of training conducted

	<p>2.4. Develop and establish/review GBV/SEA response and accountability framework to include: Allegation Procedures to report SEA/GBV incidents and internally for case accountability procedures which should clearly lay out confidentiality requirements for dealing with cases</p>	<ul style="list-style-type: none"> • Develop/review SEA/GBV Allegation Procedures to report SEAH issues • Inform teachers, school management, students and the community on how to report cases of SEAH, CoC breaches to the GM, and how such cases are handled • Develop accountability processes to address allegations of SEAH; disciplinary action for violation of the CoC by workers. 	<p>Quarter 1 after contract signing</p>	<p>Contractor, Social Safeguard Specialist</p>	<p>MoECHE, TPM</p>	<p>An established and functional accountability framework</p>
<p>3. Map out GBV/SEA prevention and response service providers</p>	<p>3.1. Stakeholder consultations for the construction/renovation of schools</p>	<ul style="list-style-type: none"> • Officially inform the stakeholders (local municipalities, schools heads, construction workers, engineers) on the construction works intended in the project areas and project risks including GBV/SEAH • Sensitize the stakeholders on GBV/SEAH risks and where to seek confidential services • Conduct regular assessment to understand the risks and limiting factors that female and male labourers have in their working environment 	<p>Prior to initiating construction. Maintained throughout Project implementation.</p>	<p>Contractor, Social Safeguard Specialist</p>	<p>MoECHE, TPM</p>	<p>Number of stakeholder consultations done</p>

	3.2. Develop and or/update a multisectoral GBV/SEAH help seeking referral pathway(s)	<ul style="list-style-type: none"> On the basis of mapped GBV prevention and response service providers develop/update a GBV referral list for service providers. Develop referral protocols that outlines key requirements for reporting cases if they arise and measures for safe, ethical and survivor centered responses. Identify key gaps where remedial measures may be required Disseminate the referral pathway/list to stakeholders including service providers 	Quarter 1 after signing works contract Maintained throughout Project implementation.	Contractor, Social Safeguard Specialist	TPM, MoECHE	<p>Referral pathway developed/updated</p> <p>Reporting mechanisms are in place and linked to support systems</p> <p>Number/type of GBV/SEA preventive and response services available.</p> <p>No. of referrals of SEAH incidents to the project GM/NPS by other service providers</p>
4. Inform project affected communities about GBV/SEAH risks	4.1. Develop relevant IEC materials for engagements with construction workers	<ul style="list-style-type: none"> Develop relevant IEC materials translated in local languages of the project location IEC materials to include information on GBV response services 	Onset of the construction works Maintained throughout Project implementation.	Social Safeguard Specialist MoECHE /GBV Advisor/ GBV Service provider	MoECHE In coordination with PMU at the FGS /FMS and WB	No and type of GBV/SEA IEC material developed

5. GBV/SEA sensitive channels for reporting in GM	5.1. Develop/Review/ Strengthen GM for specific GBV/SEAH procedures	<ul style="list-style-type: none"> Undertake internal review of GM for GBV/SEA mitigation Identify and Integrate GBV/SEA entry points within the GM with clear procedures and tools for management of related complaints Develop/review SEA/strengthen GBV Allegation Procedures to report SEAH issues Develop and update disclosure and reporting guidelines / protocol for GBV/ SEAH with a provision for victim protection and assistance. Create reporting pathways that include support systems and accountability mechanisms including how to handle SEAH allegations properly Develop simple, anonymous and confidential tracking system that GM can use to document when they observe/support and refer GBV incidents to service providers. 	Quarter 1 after signing of works contract	MoECHEs/ PMUs/ WB GBV Consultant / GBV Service Provider will act as an intermediary SEAH GM	MoECHE/ GBV Advisor	GM with GBV/SEA procedure integrated In the GM
	5.2. Train GM operators on how to handles GBV/SEAH cases and referrals as defined in the referral pathway.	<ul style="list-style-type: none"> Identify and select GBV/SEA focal persons within the GM operators Train the GM operators on GBV/SEA basics, the referral pathway, reporting and Confidentiality of data 	During Quarter 1 following signing of the works contract Retraining during project implementation.	GBV Advisor/ GBV Consultant WB	MoECHE/ GBV consultant WB	No. of GRC trained

	5.3. Disseminate information on GBV GM reporting procedures	<ul style="list-style-type: none"> Inform employees and the community on how to report cases of SEAH, CoC breaches to the GM, and how such cases are handled 	Throughout the project	Social Safeguards Specialist with support	MoECHE	No of sessions held with employees on reporting
	5.4. Review GM reports/logs for GBV/SEA sensitivity	<ul style="list-style-type: none"> Review logs for GBV/SEA documentation to ensure it follows standards for documenting GBV/SEA cases 	During project implementation.	MoECHE	MoECHE	Number of GBV/SEA cases documented
	<i>6. Separate toilet and shower facilities for men and women and signage to indicate the project site and/area is a GBV free zone</i>	6.1. Provide separate sanitation facilities for men and women around the project construction site	<ul style="list-style-type: none"> Provide separate facilities Install signage on the facilities for female and male construction workers 	During project implementation.	MoECHE	MoECHE

<p>7. <i>Third-Party Monitor (TPM) to track implementation progress of GBV risk mitigation measures.</i></p>	<p>7.1 TPM to provide oversight support to the GBV/SEA project components.</p>	<ul style="list-style-type: none"> • Conduct regular reviews on the contractors performance, including project visibility, staff awareness and contractors reporting 	<p>During project implementation.</p>	<p>TPM</p>	<p>MoECHE/ World Bank</p>	<p>Number of internal review conducted and presented</p>
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