

**Liberia Women Empowerment Program**

**(LWEP)**

**Sexual Exploitation and Abuse/Sexual Harassment prevention and response Action Plan**

**April 2024**

Table of Contents

[List of Abbreviations and Acronyms 3](#_Toc166434748)

[Key Definitions: 5](#_Toc166434749)

[2 Executive Summary 7](#_Toc166434751)

[3 Background 8](#_Toc166434758)

[Country Context 8](#_Toc166434759)

[4 Project Development Objective 10](#_Toc166434761)

[5 Legal, Policy and Institutional Framework (for review) 10](#_Toc166434762)

[International and Regional Treaties and Conventions 11](#_Toc166434763)

[6 Screening for SEA/SH Risks in LWEP 11](#_Toc166434764)

[7 Grievance Response Mechanism (GRM) 13](#_Toc166434765)

[8 The Management of the SEA/SH Prevention and Response Plan 15](#_Toc166434766)

[9 Conclusions and Recommendations 16](#_Toc166434767)

[10 SEA/SH Prevention and Response Action Plan 17](#_Toc166434768)

[11 Appendices 23](#_Toc166434769)

[Sample Commitment 29](#_Toc166434770)

# List of Abbreviations and Acronyms

|  |  |
| --- | --- |
| ASRH | Adolescent Sexual and Reproductive Health |
| ARC | American Refugee Council |
| CBO | Community Based Organization |
| CEDAW | Convention on the Elimination of All Forms of Discrimination Against Women |
| CESP | Christian Empowerment and Sustainable Program |
| CF | Child Fund |
| ESCP | Environmental Social Commitment Plan |
| ESMF | Environmental and Social Management Framework |
| GBV | Gender Based Violence |
| FGM/C, | Female Genital Mutilation/Cutting |
| GoL | Government of Liberia |
| GRM | Grievance Redress Mechanism |
| GRS | Grievance Redress Service |
| IASC | Inter-Agency Standing Committee |
| IPV | Intimate Partner Violence |
| IRC | International Rescue Committee |
| LNP | Liberia National Police |
| LWEP | Liberia Women Empowerment Project |
| MoA | Ministry of Agriculture |
| MoGCSP | Ministry of Gender, Children and Social Protection |
| MoE | Ministry of Education |
| MOH | Ministry of Health |
| MoJ | Ministry of Justice |
| MSF-B | Medicine San Frontier-Britain |
| NAP | National Action Plan |
| NGO | Non-Government Organization |
| NPGE | National Policy on Girls Education |
| NRC | Norwegian Refugee Council |
| PAPD | Pro-Poore Agenda for Prosperity and Development |
| PDO | Projective Development Objective |
| SASA | Start Awareness Support and Action |
| SCA | Survivor Centered Approach |
| SCF (UK) | Save the Children (United Kingdom) |
| SEA | Sexual Exploitation and Abuse |
| SEA/SH | Sexual Exploitation and Abuse/Sexual Harassment |
| SGBV | Sexual Gender Based Violence |
| UNDP | United Nations Development Program |
| UNFPA | Unite Nations Populations Fund |
| UNICEF | United Nations Children Funds |
| UNHCR | Unite Nations High Commission for Refugee |
| UN WHO | United Nations World Health Organization |
| UN Women | United Nations Women |
| WB | World Bank |
| WIPNET | Women In Peace Network |
| YWCA | Young Women Christian Association |

# Key Definitions:

**Abuse**-is maltreatment of a person by inflecting harm on them, whether physical, emotional or sexual or by failing to act to prevent such harm.

**Complaint** -any formal communication, written or oral about a dissatisfaction, or claim about service delivery or project implementation.

**Complainant**-a person who makes a formal complaint, written or oral about a dissatisfaction or claim, or issue of major concern. The person may be a survivor or one of the three complaints and may need address.

**Consent-** the act of consenting to any action, and his must be informed. Based on a clear assessment and understanding of the facts, implications and facture consequences of an action. There may be case where a person is unable to give informed consent due to a physical, sensory, or development disability. For example, Children under the ages of eighteen (18) years are unable to give informed consent because they are considered minors and do not have the capacity and or ability to anticipate the consequences of an action, and they may not understand their rights to refuse or be entitled to do so.

**Contractor**-a person or company that undertakes a contract to provide materials or labor to perform a service or do a job.

**Discrimination**-occurs when a person or group of people, is treated less favorable than another person or group because of their race, color, national or ethnic origin, sex, pregnancy or material status, age disability, religion or sexual preference.

The Inter-Agency Standing Committee (IASC) defines **Gender-based Violence** 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. SEA/SH 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 (IPV), trafficking, forced and/or early marriage, and other traditional practices that cause harm.

**Grievance Redress Mechanism** (GRM) is a set of arrangement that enable local communities, employees, project workers and other affected stake holders raise grievances resulting from a project when they perceive a negative.

**Mitigation-**the action of reducing the severity, seriousness, or painfulness of something.

**Perpetrator/aggressor** a person or group or institution that directly inflicts. Or, otherwise supports, violence or abuse inflicted on someone against their will. An alleged perpetrator is an individual about whom allegations of violence or abuse have been made.

**Referral** is the process by which a survival gets in touch with professionals and/or institutions regarding his/her case. It is also the process by which different professional sectors communicate and work together, in a safe, ethical and confidential manner, to provide the survival with comprehensive support.

**SEA/SH Referral Pathway**-A flow chart that directs communities and survivors of SEA/SH to readily available response service.

**Sexual Abuse-** actual or threatening physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. In finance operations/projects, sexual abuse occurs when a project worker, contracted staff, sub contracted staff, supervisors etc. uses force or unequal power vis-à-vis a community member or colleague to perpetrate or threaten to perpetrate an unwanted sexual act.

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. “SEA” is therefore a form of GBV and generally refers to acts perpetrated against beneficiaries of a project by staff, contractors, consultants, workers and partners.

**Sexual harassment** 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.

**Social services** are defined as services pertaining to ARSH, GBV services and education; livelihoods services are defined as provision of training, grants, and strengthening of cooperative groups; and social norms are defined as norms that accept and promote violence against women.

**Survivor or survivor** a person who have experience and incidence of SEA/SH. The terms “SURVIVOR” and SURVIVOR are interchangeable. The term “survivor” is often used more in the legal and medical fields; The Term “survival” is used more in the psychosocial support sector, being seen as a term that builds the resilience and strengths of a person who has experience violence.

**Survivor Centered Approach** is the establishment of a relationship with the survival that promotes their emotional and physical safety, building trust and helping them restores some control over their lives.

# Executive Summary

The Liberia Women Empowerment Project (LWEP) is established by the Government of Liberia to be implemented by the Ministry of Gender, Children and Social Protection, using both credit and grant from the World Bank.

The project was approved by the World Bank on June 22, 2022, and became effective on May 8, 2023. With a total financing of 44,600,000.00 United States dollars, it aims to reach about 267,200 people using the SASA methodology of which 73,000 are women between the ages 15-64.

The overall objective of the project is to improve social and livelihood services for women and girls in targeted communities in six (6) Counties, (Bomi, Montserrado, Gbarpolu, Rivercess, Grand Cape Mount and Grand Gedeh Lofa) to foster positive social norms and strengthen the government's capacity to advance women and girl’s empowerment.

The Liberia Women Empowerment Program is also fully aligned with recent government initiatives to advance implementation of key gender policies and plans, including the Second Phase of the National Action Plan on Women, Peace and Security (2019-2023), the Sexual and Gender Based Violence (SGBV) Roadmap (2019-2022), the National Action Plan on the Prevention and Management of SGBV, and the MoGCSP two year Strategic Plan (2021-2023), which has informed the design of Component 4’s capacity-building support for MoGCSP. The project has also integrated climate-resilient activities in alignment with Liberia’s NAP (20202030)

The project also addresses the issues of climate-resilient livelihoods through the integration of a climate change lens to address adverse impact that are barriers to women empowerment, particularly women in rural areas as well as access to healthcare and education; these activities will include pilot interventions to enhance local GBV response and Adolescent Sexual Reproductive Health (ASRH) services as well as school-driven community engagement on adolescent pregnancy, early marriage and keeping girls in school.

The Project consists of five components (1). Fostering Positive Social and Community Mobilization 2. Enhancing Basic services in Health and Education (3). Promoting resilient livelihoods through community-led approaches (4). Strengthening public institutions to advance gender equality and (5). Project management, monitoring and evaluation)**.** As part of Component 5, the Project aims to improve the institutional capacity of the MoGCSP and other key ministries to enhance their ability to deliver gender and GBV-focused programming at central and local level over the long term. Prior to the commencement of activities with beneficiaries, LWEP will invest in in capacity-building, using a phased approach in which operational procedures and the GRM are fully established.

The project will likely involve project actors and project beneficiaries at the level of the community which raises the risks of SEA/SH. Further, the project is likely to be implemented in rural areas where access to quality GBV services or support of efficient service providers for survivors is limited. The project will also establish clear risk mitigation measures for sexual exploitation and abuse (SEA) and sexual harassment (SH), including SEA/SH risks that may arise from interactions among project workers and between project workers and beneficiaries.

# Background

Given Liberia’s high rates of GBV prevalence, particularly among young and vulnerable women and children, including high rates of exploitative transactional sexual relationships, both the Environmental and Social Management Framework (ESMF) and Environmental Social Commitment Plan and (ESCP) has provided that a SEA/SH Action Plan be developed to assess and manage the risks related to SEA/SH beyond the current context.

This Sexual Exploitation, Abuse and Harassment (SEA/SH) Prevention and Response Action Plan has been prepared for the Liberia Women Empowerment Program (LWEP), a World Bank financed project that is being managed by Project Management Unit at the Ministry of Gender, Children and Social Protection (MoGCSP).

The LWEP program aims to enhance women’s empowerment by addressing social norms (with focus on SEA/SH prevention and response) and improving access to livelihoods and building the capacities of national institutions.

It is against this background that, the Government of Liberia has develop the LWEP to improve social and livelihood services for women and girls in targeted communities to enable positive social norms and strengthen the government's capacity to advance women and girls’ empowerment, while strengthening the institutional capacity of the Government of Liberia to advance gender equality by firstly addressing sustainability which will in the longer term develop a national government program on gender and empowerment.

## Country Context

The Government of Liberia (GoL) is committed to reducing gender inequality and GBV as part of its broader development agenda and climate adaptation strategy. However, social norms that subordinate women to men are a significant driver of inequality and violence, exacerbated by the limited capacity of the Government of Liberia to address gender issues.

In Liberia, women’s empowerment is hindered by economic, social, and institutional barriers that exacerbate gender inequality.Despite GoL’s long standing efforts to move towards a more gender equal society, women’s empowerment in Liberia is hindered by several interrelated barriers that prevent them from being fully included in socio-economic opportunities. These barriers do not operate in insolation: economic gender gaps in income, access to jobs and credit are closely linked to women’s subordinate social status, as norms and beliefs about the roles of women and men drive women’s significant household care burden and restrict their choices of employment to socially-acceptable, lower paid roles.

These barriers also increase the vulnerability of women and girls to the impacts of changing climatic conditions over time. Attitudes and beliefs about women’s subordinate status also drive the wide acceptance of GBV, early marriage, adolescent pregnancy and FGM/C, and the devaluing of girls’ education as compared to boys. Low levels of education, early marriage and pregnancy, and limited access to healthcare as well as other services trap women in a cycle of poverty and are further limiting their opportunities.

**Guidance by the WB on SEAS/H**

The WB Guidance Note defines four key areas of GBV risks below as follows:

* SEA - exploitation of a vulnerable position, use of differential power for sexual purpose, actual or threatened sexual physical intrusion;
* Workplace sexual harassment - unwanted sexual advances; requests for sexual favors, sexual physical contact;
* Human trafficking - sexual slavery, coerced transactional sex, illegal transnational people movement; and
* Non-SEA - physical assault, psychological or physical abuse, denial of resources, opportunities, or services and Intimate Partner Violence (IPV).

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

# Project Development Objective

The Project Development Objective (PDO) of the LWEP is to improve social and livelihood services for women and girls in targeted communities, foster positive social norms and strengthen the government's capacity to advance women and girls’ empowerment.

# Legal, Policy and Institutional Framework (for review)

Liberia has made notable gains since the end of its civil conflict in 2003 and has put into place robust policies and institutional frameworks for addressing GBV.

These policies include the National Policy on Girls Education (NPGE) of 2006 which seeks to increase girls’ enrolment and retention to education and the Liberia National Action Plan on Women Peace and Security 2019-2023. This National Action Plan is constructed on five pillars which seeks to prevent a relapse of conflict and all forms of structural and physical violence against women and girls including Sexual and Gender Based Violence (SGBV) and violence done under the threat of terrorism, to ensure that women and young girls’ safety, physical and mental health and their human rights are respected and protected, and to ensure that women and girls specific needs are met especially those most vulnerable to violence. The Liberia Domestic Violence Act seeks to address violence against women and children and ensure maximum protection of their rights in the domestic setting.

The LWEP is also aligned with the GoL priorities under the Pro-Poor Agenda for Prosperity and Development-PAPD (2018-2023), complementing Pillar One which focuses on gender equality in political, social and economic life. The PAPD includes a range of women’s empowerment objectives and interventions, including gender-responsive budgeting, stronger implementation of the National Gender Policy of 2009 to eliminate discrimination, and GBV reduction targets.

This project further aligns all five (5) pillars of the PAPD with a strong focus on empowerment of the people and emphasized the empowerment of women (pillar 1), economy by supporting economic opportunities in areas with significant potential growth (pillar 2), sustaining the peace through a focus on reducing violence (pillar 3) and governance (pillar 4) through the strengthening of institutions within the GoL.

The project fully aligned with recent government initiatives to advance implementation of key gender policies and plans, including the Second Phase of the National Action Plan on Women, Peace and Security (2019-2023), the Sexual and Gender Based Violence (SGBV) Roadmap (2019-2022), the National Action Plan on the Prevention and Management of SGBV, and the MGCSP’s two-year Strategic Plan (2021-2023), which has informed the design of Component 4’s capacity-building support for MGCSP.

Additionally, the project integrates climate-resilient activities in alignment with Liberia’s NAP (2020-2030) and is aligned with GoL’s renewed emphasis on eliminating GBV as demonstrated by the September 2020 declaration, a national emergency on rape and the introduction of the Anti-SGBV Roadmap (2020-2022).

The project aligned with international instruments against GBV -Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), the African Charter on Human and Peoples’ Rights (Banjul Charter), and the Protocol to the African Charter on Human and Peoples’ Right of Women in Africa (Maputo Protocol).

Finally, Article 6,8 &18 of the constitution of Liberia recognizes human dignity, equity, social justice, inclusiveness, equality, human rights, non-discrimination, and protection of the marginalized as part of National values and principles of governance. Therefore, any illegal aggression on the person that compromises human dignity is unconstitutional. Hence SEA/SH is not only illegal, but also a human rights violation and unconstitutional in Liberia.

## International and Regional Treaties and Conventions

The Convention on the Elimination of All Forms of Discriminations Against Women (CEDAW) was ratified by Liberia National Legislature on September 29, 1998 and signed into law by the Liberian President on October 15, 1998. This treaty seeks to realize equality between men and women by ensuring that there is no discrimination against women in all spheres of life. This means that women should compete for the same positions with men whenever employment opportunities arise. Any discrimination will therefore constitute SEA/SH against women.

Article I of the Convention defines “discrimination against women” to mean “any distinction, exclusion or restriction made based on sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.”

The African Charter on Human and Peoples’ Rights (Banjul Charter): Article 5 of the charter guarantees every individual the right to dignity which includes the protection from all forms of exploitation and human degradation. SEA/SH manifests different forms of inhuman treatment to survivors and in many cases, it is a form of exploitation.

*Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol).*

* Article 3 of the protocol seeks to eliminate all forms of discrimination against women and require States Parties to pass necessary legislation to ensure equality between women and men.
* Article 4 of the protocol guarantees every woman dignity and requires States Parties to adopt appropriate measures to prohibit any exploitation or degradation against women.
* Overall, Liberia has the requisite policy, legal and institutional framework to prevent and curb SEA/SH. However, SEA/SH has not been eradicated. Every effort at preventing SEA/SH is a work in progress in every sector of society.
* The project aims to prevent and respond to SEA/SH complaints and incidences in an effort to ensure that the project does no harm to the beneficiaries and workers.

# Screening for SEA/SH Risks in LWEP

Existing high levels of GBV prevalence and gender inequalities in Liberia may be inadvertently reinforced by the implementation of this project. Projects such as LWEP are likely to place women and girls in situations where they may be exposed to sexual harassment, exploitation, and abuse. Therefore, it is imperative for LWEP to proactively plan to mitigate SEA/SH risks that may emerge in project sites as a result of LWEP interventions.

Some of the factors that contribute to vulnerability of women and girls to SEA/SH in the project areas are listed below as follows:

*Poverty and Inequality.* Widespread poverty and inequality that invariably leads to desperation and a situation where some women and girls may be vulnerable to SEA/SH during their interaction with project staff, and consultants who are responsible for facilitating the delivery of training and awareness raising activities to beneficiaries and helping beneficiaries to submit proposals for the livelihoods grants under the project. Average poverty levels are not uniform in all six (6) project counties, but there are pockets of extreme poverty in each of the counties which exacerbates vulnerability to SEA/SH.

*Societal norms.* Women and girls are at usually high risk of SEA/SH because of *societal norms* that perpetuate power differentials between males and females, and support or condone males’ violence against women and girls. Injection of resources through grants and livelihood interventions can change the power dynamics between community members, at the markets where women would operate in and within their households. This could lead to men attempting to gain control of financial resources provided to women entrepreneurs and further increase GBV (domestic violence, intimate partner violence). LWEP’s engagement of community members in social and behavioral change communications around GBV and distribution of livelihoods grants to women can cause a backlash against women beneficiaries and exacerbate vulnerability to SEA/SH.

*Education and Literacy-Low levels of education and literacy.* Low levels of education and literacy among girls can lead to high unemployment rates. These factors weaken women’s and girls’ confidence as they seek menial jobs in male dominated work sites for example, construction sites making them most at risk of SEA/SH.

Some of the forms of SEA/SH committed by project workers against women and girls in the community that could arise from the project include rape and sexual assault, physical and emotional abuse. Sexual harassment may include inappropriate touching, use of abusive, and demeaning or culturally inappropriate language. Sexual exploitation will likely include transaction sex and other forms of humiliating, degrading or exploitative behavior.

One of the major risks faced by female staff of LSP/Association is the risk of working in the field.

The fact that these Females Community Based Agents will travel a lot among communities could face risk of SEA/SH. This SEA /SH Plan will also detail preventive measures to protect female staff traveling at night and or sleeping in villages that aren’t their own and or having safe space

Other risk factors for SEA/SH include female laborers working alongside male laborers without separate washrooms for males and females; and without specific feedback mechanisms for females to share concerns about their working environments, including concerns about sexual harassment.

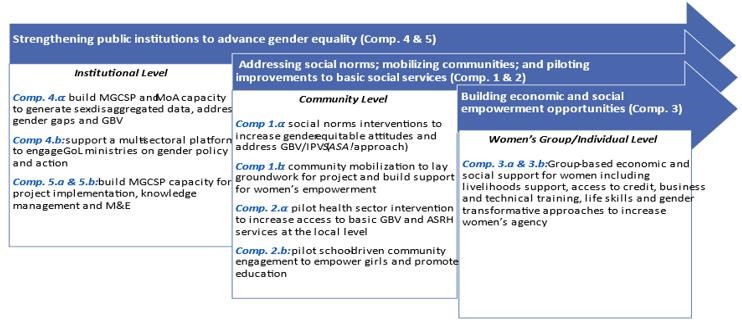
Prevention and response to LWEP-related risks of SEA/SH requires concerted and multifaceted efforts bringing together many sectors including Ministries, Agencies, Corporations (MACs), Civil Society, the Police, Health Facilities and other Care givers. The project will coordinate with these actors in creating awareness in the host communities and project staff to reduce any need for response efforts.

The project’s Gender Specialist is expected to work closely with the PMU’s Social, Livelihood and Communications Specialists, the Lead Service Provider’s Gender, Livelihoods and Social Specialists, and staff from the MGCSP at the national level, to coordinate efforts towards mitigation of SEA/SH prevention and response actions.

Some activities of the LWEP may cause SEA/SH risks for workers, spouses/partners, community members by project workers, and among project workers thereby justifying the development of a SEA/SH risk mitigation Action Plan for the LWEP to avoid potential Sexual Exploitation and Abuse and (SEA) / Sexual Harassment (SH) during project implementations.

This SEA/SH Prevention and Response Action Plan details operational measures and protocols necessary to address all forms of SEA/SH related to the project and how they will be integrated over the life of the project. These include how to address any SEA/SH allegations that may arise and procedures for preventing and responding to SEA/SH. The Plan also details how reports on SEA/SH will be handled (investigation procedures) and disciplinary action for violation by project workers. The overall risk rating of the project is rated substantial.

**Structure of the**



# Grievance Redress Mechanism (GRM)

The project will be required to put in place a GRM with multiple channels to facilitate confidential logging in of SEA/SH complaints in all the project locations. It will be necessary to identify and integrate SEA/SH entry points within the GRM with clear procedures and tools for safe, confidential, and ethical management of related complaints. Considerations related to SEA/SH will be integrated into GRM explicitly developed for project workers.

As part of the overall project, consultations on the GRM with affected communities (particularly with women, girls and people living with disabilities) will be conducted to determine the preferred alternatives to in-person complaints (e.g., phone, online, networks and other). The process will emphasize confidentiality and anonymity. The LWEP GRM will adapt lessons from other projects to strengthen accountability to communities and identify a range of issues by holding periodic team meetings to discuss any workplace concerns.

In setting up a GRM to facilitate resolution of SEA/SH complaints, the project will be guided by the following principles:

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

will implement a survivor-centered approach to managing SEA/SH complaints including the use of SEA/SH survivors’ referral pathway. The focus of GM would be on confidentiality to protect the privacy and choices of the survivor, and urgency to preserve evidence and access assistance and care for the survivor. For these reasons the complaint is not expected to follow a uniform pattern. The complainant will be free to use any avenue to report including text message, email, phone call, written note, or word of mouth in person to trusted colleague, member of the GRM, SEA/SH service provider, or local CBO or NGO and Networks, among others. If the complaint is received by any other person or entity other than the designated SEA/SH services provider, the case should be referred as soon as possible thereafter to the service provider.

The LSP will established its internal/workers GRM to accommodate its staff/associations and communities Based Organizations/Associations for an effective implementation.

There will be regular coordination of activities between Project Staff, SEA/SH GRM and the one that the community reports to throughout the project period at the national, county and community levels.

The process of assistance will follow the steps below. The person that receives the complaint/report will inform LSP Focal Person. The LSP Focal Person/GRM Consultant arranges for any required emergency support and care in coordination with the designated SEA/SH service provider and contemporaneously refers the case to the LWEP Focal Person/GRM Consultant who will than in all cases report SEA/SH incident within 24 hours to the MoGCSP. The designated SEA/SH service provider is the existing available services for survivors in project locations including health care, psychosocial support, police, and legal/justice services which has been mapped out by the project.

The only information to be collected from the complainant or person reporting SEA/SH incidence(s) from the communities to the GRM will be on:

1. demographic data, such as age and gender;
2. the nature of the complaint (what the complainant says in her/his own words);
3. whether the complainant believes the perpetrator was related to the project; and
4. whether they received or were offered referral to services.

SEA/SH

The current project will put in place mitigation measures as per the project risk level to address SEA/SH as follows:

1. SEA/SH requirements and expectations included in the contractual obligations for project staff.
2. Develop and deliver information, education, and communication materials for key stakeholders/actors to indicate that the project and/area is a SEA/SH free zone and provide information on SEA/SH response services (such as hotline numbers and where to seek assistance when needed).
3. Ensure that a project hired GBV Specialist is in place to support SEA/SH risk management measures
4. Define SEA/SH requirements and expectations included in the contractual staff agreements and Code of Conduct (CoC) that addresses SEA/SH in the project locations to create an environment free from SEA/SH and disseminate CoC to the workers

Other information to be highlighted include:

* No sexual or other favors can be requested in exchange for services;
* Project staff are prohibited from having sexual relations with minors below the age of 18 years;
* Project staff are prohibited from engaging in SEA/SH and this information should be clearly spelled out during training and other forms of communication to the staff;
* Importance of timely reporting/consequences of delayed reporting, SEA/SH GRM reporting channels and grievance handling process including support provided to survivors;
* Any case or suspicion of SEA/SH should be reported **within 24 hours** to hotline number, GRM or citizen engagement/feedback mechanism; This action plan proposes three levels reporting channel as indicated in the LWEP Communication Action Plan. Community, County and National GRM Committees.
* Information on protection of whistleblowers;
* The range of services available for survivors including healthcare, protection, legal and psychosocial care.
* Identify and map SEA/SH service providers to ensure information is made available to health service providers on where psychosocial support and emergency medical services for survivors of SEA/SH can be accessed (within the healthcare system);
* Develop SEA/SH prevention policy and response procedures that outline key requirements for reporting cases if they arise, measures to enable safe, ethical, survivor-centered response and disciplinary processes;
* Train all project staff and workers (where feasible) and integrate understanding of the SEA/SH as well as accountability and response framework including the referral processes, responsibilities and reporting in other trainings;
* Utilize the GRM developed under the project with a separate channel to manage SEA/SH related complaints to enable reporting in a safe, confidential survivor-centric manner.
* Cases of SEA/SH can be reported through the general Project GRM – through the suggestion box, or through the GRM Hotline Operator, phones calls, emails etc. to be developed). The project GRM will ensure all incidents of SEA/SH reported through the general GRM system are relayed to the Project Management (PMU) within 24 hours.

# The Management of the SEA/SH Prevention and Response Plan

The MoGSP/LWEP Project Coordinator (PC) will be responsible for the adoption and over all implementation of the SEA/SH/SH Prevention and Response Action Plan. The MoGSP/LWEP PMU technical Consultants will work closely with the LSP to oversee the execution of this SEA/SH at the national levels through the provision of technical support

The LSP Project managers in coordination with the MoGSP Gender County Focal Person will be responsible at the County levels while the PMU Gender and Social Specialists at the LWEP will have the primary responsibility to ensure the day-to-day implementation as well as the execution of the below listed responsibilities. These responsibilities are further clarified in the SEA/SH/SH prevention and Response Plan.

1. Develop a detailed referral pathway for the project;
2. Develop a Monitoring and Evaluation Framework for the SEA/SH Action Plan implementation;
3. Formulate a training program for Project staff and workers at the various levels - national, county and community. This exercise will adapt from already existing training material;
4. Ensure that survivor centered approach to SEA/SH is implemented;
5. Sensitize communities on the SEA/SH Prevention and Response Action Plan, project SEA/SH risks, services, GRM and Code of Conduct (CoC);
6. Ensure timely escalation of reported project related SEA/SH incidents to project management for timely notification of the World Bank.
7. Document/log all SEA/SH cases including status of cases (ongoing, completed, closed, etc.);
8. Monitor and report on the Prevention and Response actions of the Plan;
9. Notify the MoGCSP and the PMU on any concerns related to SEA/SH for the project;
10. Report project-related SEA/SH to the MoGCSP and World Bank within stipulated timeframe.

# Conclusions and Recommendations

In conclusion, though the referral pathway in most counties in Liberia is not completed because the MoGCSP and other line ministries such as Ministry of Justice lack logistics and adequate staff; most counties in Liberia do not have police presence to enforce the law.

However, the LWEP under preparation will bring about social change including changes in gender relations resulting from the empowerment of women and girls’ activities. These actions will also bring about economic empowerment.

Overall, SEA/SH risks under the project are rated as substantial which will be managed through implementation of this Action Plan.

The project shall have zero tolerance to SEA/SH cases among project workers and shall take pro-active steps towards sensitization and prevention.

In the event that any SEA/SH case is reported, MoGCSP/LWEP must inform the World bank in a timely manner (within 48 hrs of reporting), have a well-coordinated and integrated multi-agency response mechanism to respond and a GRM developed under the project with a separate channel to manage SEA/SH-related complaints to enable reporting in a safe, confidential survivor-centric manner and for accountability.

The MoGCSP/LWEP SEA/SH Action Plan is a living document and will be updated as the project unfolds and especially as the subprojects become clearer.

The responsibility to implement the plan will rest with the PMU at the national level and the Lead Service Provider at the county and community levels. Therefore, it is hereby recommended that the project sets aside human, financial and physical resources to enable timely implementation of this Plan

# SEA/SH Prevention and Response Plan

The table below provides a customized summary of SEA/SH prevention and response plan for use by the LWEP. The LWEP staff, GRM and Communication Consultants will coordinate sensitization on SEA/SH for the project. He/She will also be involved in the mainstreaming of SEA/SH issues into project activities. The project’s focus is on preventing and responding to GBV including SEA/SH. Issues of SEA/SH are mainstreamed throughout the project. The implementation of the GBV prevention and response activities and SEA/SH action plan will be supervised by the Gender and Social and Safeguards Consultants at the PMU and LSP.

**LWEP** SEA/SH Plan for Prevention and Response

|  | **Objectives** | **Activities / Steps to be taken to Address SEA/SH risk** | **Timelines** | **Responsible** | **Monitoring (Who will monitor)** | **Output Indicators** | **Time period (days)** | **Estimated Budget (USD)** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1 | **Coordination, Networking and Partnership** | | | | | | |  |
|  | To develop a holistic and integrated SEA/SH Management Team that will focus on the process of addressing SEA/SH. eg. (National Governments-MoGD, LSP/ Partners, County Authorities, Women and Youth groups, Organization and the local communities). | * Agree on which stakeholders will constitute the SEA/SH Management team. * Develop ToR to guide the SEA/SH Management Team. * Develop operational guidelines * Conduct training workshops to equip the SEA/SH Management Team to engage with the rest of the project team while inculcating various tools to deal with SEA/SH | Constitute SEA/SH management Team and initial training within the first year.  Annual follow-up training including sharing of practical experiences. | Social GRM Specialists / Gender Consultants at the PMU and LSP Levels | MoGCSP /PC/M&E | * SEA/SH Management Team Constituted and functioning as per ToR developed * # of trainings conducted for SEA/SH Management Team | Six (6) trainings five days per County; total of 30 days and 6 follow-up training 2 days per County, total of 12 training days | 50,000.00 |
|  | To ensure that SEA/SH is an agenda items during Monthly County Coordination Meetings as it is a key result area that will determine the success of the project | * Include the items below in the organized regular County meetings: * SEA/SH Reports and updates * Follow up actions | Within the first year of the project | PMU | MoGCSP/ PC | * # of Counties Coordination meetings held with SEA/SH as an agenda item * Percentage of cases / issues / concerns followed-up | Monthly Counties Coordination Meetings | **6,000.00** |
| **2** | **Mapping SEA/SH Prevention and Response Service Providers** | | | | | | |  |
|  | Map out communities where the project is implemented for referral services for survivors of SEA/SH; map out to include CBOs, NGOs, and other civil society organizations  Undertake social cultural environmental mapping to identify stakeholders for response mechanism in relation to SEA/SH contexts | * Conduct field visits and or remote (desk) review or stakeholders’ consultation to identify and map existing services, gap analysis, entry points for survivor assistance, and local actors working on the prevention of and/or response to gender-based violence. * Analyze available services for survivors in all project locations and assess their quality as per standards, including health care, psychosocial support, police, and legal/justice services | Within the first year of the project | External Consultant/Service Provider | MoGCSP/PMU | The Mapping Report | 60 days  *\*****Please note that this activity is also a part of the LWEP Work Plan and is being outsource to an external firm/Consultant but is necessary for the action plan to guide the LSP*** | **130,000.00** |
|  | Conduct review and update the multi-sectoral SEA/SH referral pathway(s) in line with National Systems that will consider confidentiality, so that survivors will have a place to go and report; have access to service providers; ensuring witness protection. | * Update and disseminate the referral pathway/list to stakeholders including service providers | Within the first year of the project work plan and annually | Gender consultants and Social Specialists within the LSP | Gender and Social Specialists within the PMU, PC and MGCSP County Coordinators | Referral pathway updated and level of dissemination | 1 Days per County; total of 6 days for six (6) for 6 counties excluding traveling days |  |
| **3** | **Capacity Building** | | | | | | | **40,000.00** |
|  | Provide support through trainings to strengthen the ability of the SEA/SH Management Team to effectively and efficiently handle cases of SEA/SH.  The goal is to strengthen a SEA/SH Management Team and provide them with relevant training that will enable them to share knowledge, detect any behavior that might lead to SEA/SH, understand laws surrounding SEA/SH and know the channels of reporting. | * Provide a comprehensive training on SEA/SH highlighting its causes, consequences and the management and responses for key stake holders including County Teams and Focal Points, community-based organizations, traditional and faith leaders, media, and other stakeholders on innovative approaches for prevention of, and response to SEA/SH. * Work with the SEA/SH Management Teams for effective research, monitoring and evaluation of SEA/SH programs and services to support generation of evidence for inform decisions. | Within the first year of the project imple- mentation  To be reviewed as need be, for ex. when a staff exits or when there are notable training needs. | Gender and Social Specialists at the PMU and LSP | MoGDSP/PMU and MGCSP County Coordinators | # of training sessions  Name and # of staff trained to provide  SEA/SH related services in the counties.  Training Materials and or evidence of training | Continue |  |
| **4** | **Prevention and Awareness** | | | | | | | **50,000.00** |
|  | To contribute to an effective understanding of the magnitude of SEA/SH and what can be done to prevent such scenarios during and after project implementation  To prevent early detection of any practices that may lead to SEA/SH and assist in eliminating or address any social, political, cultural tradition and religious factor that gives lee ways to SEA/SH. | * Enhance and utilized the already developed MoGDSP / LWEP Communication Strategy to educate and raise awareness about SEA/SH. * Involve stakeholders from communities where the project is being implemented in the enhancement of the already developed MoGDSP / LWEP Communication strategy for effective referral services for survivors of SEA/SH | To be reviewed throughout the project implementation | Gender and Communication Specialists within the LSP | MoGCSP/PMU and MoGCSP County Coordinators | * Communication strategy and Stakeholder Mapping Report | Continuous -throughout the project period |  |
| **5** | **Response and Support** |  |  |  |  |  |  | **80,000.00** |
|  | Strengthen the delivery of effective, accessible, and responsive protection, care, and support services to those affected by SEA/SH/Gender-Based Violence involving a high level of confidentiality. | * Regular update of mapping report * Contact and mobilize social facilities such as health, justice, legal and psychosocial support services for an effective, efficient, and human rights-based approach to SEA/SH mitigation * Provide dedicated and responsive services to survivors of SEA/SH- emergency transport facilities in coordination with the existing service providers networks and actors experience in this aspect. * Enact a strong, well-coordinated and integrated multi-agency response to SEA/SH including a good structure of referral networks in collaboration with community, traditional and religious leaders. * In consultation with legal personnel, update the legal and institutional framework in harmony with the existing SEA/SH needed to assist survivors and survivors of SEA/SH. * Identify community-based safe shelters with the right personnel and outreach services for the protection of survivors of SEA/SH. * Enforce relevant laws on the SEA/SH perpetrators and re-integration in the community to reduce repeat offenses. | Throughout the project life cycle | Gender Specialists within the LSP and MoGDSP / PMU and the SEA / SH Management Team | MoGDSP-National Project Coordinator | Well informed communities that are ready to protect women and girls  A well-structured legal body specifically dealing with SEA/SH issues in place  Operational code of conduct being adhered to.  Women and girls who are aware of their rights  Women are educated and placed in positions where they can benefit from the value addition programs | Throughout the project life cycle |  |
| 6 | **Grievance Management (GRM) for SEA/SH Responsive Reporting** | | | | | | | **61,000.00** |
|  | To sensitize the community on channels available for reporting any cases of SEA/SH with a focused on confidentiality.  To protect the privacy and choices of the survivor, and urgency that would in turn preserve evidence and access assistance and care for the survivor | * The project GM for SEA/SH cases will review and or amend existing GM to ensure it meets the current SEA/SH needs in order to create a conducive environment that is safe for survivors/victims to report and take shelter. * Guide the community and employees on the channels of reporting cases of SEA/SH and what constitutes sexual harassment as per the guidelines. * Outline the penalties and disciplinary actions that will be taken against anyone who breaches the employees code of conduct. | Occurrences throughout the project implementation | Gender Consultant and GM focal points within the LSP and PMU | MGCSP / PMU and County Coordinators | The ability for survivors of sexual harassment to easily reach out to report an attempt of action of violence against them and receive a supportive response immediately. | Continuous |  |
| **7** | **Monitoring and Evaluation** | | | | | | | **75,000.00** |
|  | To develop a set of key quantitative and qualitative indicators to manage measure and monitor the progress and effectiveness of the integrated effort to deal with SEA/SH that would measures how well policies are being adhered to, any issues that might emerge in regard to SEA/SH and recommendation to improve any situation that may arise. | * Develop instruments meant to measure the types of reported cases of SEA/SH categorized in their various forms, such as child sexual abuse * Mechanism to measure effectiveness of the various support systems to respond * Conduct at least three-time survey to assess project workers knowledge and attitudes towards the SEA/SH issues * Develop mechanisms to measure the impact of Public Education, Awareness Creation and Campaigns conducted by the SEA/SH teams. | Occurrences throughout the project life | Gender Consultants within the LSP and PMU | PMU, and Key Stakeholders | How effective is the interventions and support offered to survivors of SEA/SH  How many success stories have been reported in relation to SEA/SH  Shift in attitude of project workers. | Continuous |  |
|  |  | **TOTAL** |  |  |  |  |  | **495,000.00** |

# Appendices

**Annex 1: SEA/SH Treatment and Counselling Procedures**

The Survivor-Centered Approach (SCA) is recommended to be used in counseling SEA/SH survivors because it aims at creating a supportive environment in which a survivor’s rights are respected and in which the survivor is treated with dignity and respect. This approach helps promote a survivor’s recovery and empowers them to make decisions about possible recovery interventions.

The SCA is considered essential for the following reasons:

* To protect survivors from further harm
* To provide survivors with the opportunity to talk about their concerns without pressure
* To assist survivors in making choices and in seeking help if they want help
* To cope with the fear that they may have about negative reactions (from the community or their family) or being blamed for the violence
* To provide basic psychosocial support (PSS) to the survivor
* To give back to the survivor the control they may have lost during the SEA/SH incident

The traumatic states are formed of three dimensions: 1. emotions, 2. thoughts, and 3. deeds. Therefore, needs of women come from these three recovery domains: emotional awareness, cognitive autonomy, and acting in/with autonomy. These domains are the focus of counselling in SCA. The domains are as follows:

**Emotional awareness**

Psychotherapeutic hypothesis emotions are one of the major blocks / barriers of women to move out of the violent situations or to be able to overcome trauma from the past. Therefore, to support women on their way to autonomy, step one is work on women’s emotional awareness through identified steps:

* recognizing one’s own emotions
* naming emotions (fear, guilt, shame, helplessness, low self-esteem, etc.)
* letting emotions out (crying, rage expressing, etc.)
* expressing emotions verbally (talking about her emotions)
* emotional independence (process of controlling emotions)
* information about trauma phases (learning through experience of others)
* awareness of one’s survivor role (learning about conditioning of emotional states)

**Cognitive autonomy and justice**

Psychotherapeutic hypothesis is that emotion that not only block the changes but also causes to have rational concepts about themselves. These concepts are constructed by patriarchal society as well as family model a particular woman lived in. Therefore, to support women on her way to autonomy, step two is work on the woman’s own concepts of herself through identified steps:

* awareness of the violence problem (enough to be able to talk about it)
* understanding male-female patriarchal conditioning (enough to know she is not guilty)
* understanding wheel of violence (experience of others structured contributes to cognitive clarity of her own situation)
* positive valuing oneself
* safety plan made (in case a woman is still in danger)
* informed about her rights (information of one’s own rights encourages self-control)
* take responsibility for her condition of life (leaving the role of survivor)

This dimension as well includes need for justice. Sometimes a long period of time in injustice has been exercised upon her. Need for justice includes:

* information about her rights
* information how to achieve justice
* support in actual legal process

**Acting in/with autonomy**

The post traumatic behavior also means living in silence and non-doing. Therefore, third aim of counseling is supporting women to act toward the responsibility for their own change by:

* ending silence (when she asked for support, she already broke the silence)
* ending non-doing (breaking the logic of the role of the survivor)
* deciding according to her needs and wishes (starting a process of taking control of her life)
* acting according to her needs/wishes (instead of obeying the wishes/needs of others)
* using her own support system (her own healthy/positive characteristics)
* using friends that can help her (using all the means to resolve her situation)
* using institutions that can support her as means to her autonomy

Acting in autonomy means living in safe spaces. This dimension implies need for safety. Need for safety includes:

* acting according to safety plan (in case a woman is still in danger)
* moving to safe houses (shelters)
* using legal system, if needed, as means to her autonomy
* exercising legal measures, if they exist, to move out the perpetrator

Counseling service works with women dealing with violence in family, sexual violence, war violence and violence through cultural pressure on women. Whatever the types of violence women experience, the aim is to encourage women to take control of their life situations and take responsibility to overcome violence, move toward justice and become responsible citizens. The counselors do not decide whether women shall leave violence situations. The aim of counseling and advocacy is to stop violence and not relationships. Experience shows that many women (must) continue to live in the same/similar living conditions as before.

**Note:** These SEA/SH Treatment and Counselling Procedures should not be used by anyone except a trained and certified counsellor or medical service provider. Moreover, these are only a sample and should be interrogated further before use.

**Annex 2: SEA/SH Reporting Process & Form**

The SEA/SH reporting process is characterized by two cardinal elements namely, confidentiality and urgency. Confidentiality to protect the privacy and choices of the survivor, and urgency to preserve evidence and access assistance and care for the survivor. For these reasons the complaint is not expected to follow a uniform pattern.

The complainant will be free to use any avenue to report including text message, email, phone call, written note, or word of mount in person to trusted colleague, member of the GRM, SEA/SH service provider, or local CBO or NGO, among others.

If the report is received by any other person or entity other than the designated SEAS/H services provider, the case should be referred as soon as possible thereafter to the service provider.

The process of assistance will follow the steps below. The person that receives the complaint/report will inform PMU Project GRM. The PC arranges for any required emergency support and care in coordination with the designated SEA/SH service provider and contemporaneously refers the case to the service provider. In the meantime, the service provider causes (in all cases) the PC to report any SEA/SH incident to the GRM within 24 hours.

Meanwhile complaint is referred to the SEA/SH Complaints Team which:

* Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
* Refers the case to the police as appropriate and according to the law
* Assigns the appropriate ‘Focal Point’ to implement the actions—with the assistance of the SEAS/SH Services Provider in accordance with their employment contract and the appropriate code of conduct if applicable.
* Upon resolution, the Focal Point and SEA/SH Services Provider advise the SEA/SH Code of Conduct Team (SCCT) that it has been resolved, who in turn advise the GRM operator.
* The GRM operator notes the resolution and closes the case.

**Annex 3: SAMPLE MGCSP GBV/ SEA/SH REPORTING**

FORM

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Survivor Code: |  | | | Case Worker Code |
| Date of Incident | Date of Report: | | | Time of Incident |
| Date of Birth | | Place of Birth | | |
| Nationality | | SEX | | |
| Occupation | | Marital Status | | |
| \_\_\_\_\_\_\_\_Reported by the survivor  \_\_\_\_\_\_\_\_Reported by a parent guidance or family member  \_\_\_\_\_\_\_\_Reported by a project Staff or Someone else | | | | |
|  | | | | |
| Level at which the grievance was handle | | | Health facilities | |
| Police | |
| Court | |
| Others | |
| DETAILS OF THE INCIDENCE | | | | |
| Account of the Incidence/description of the incident (summarize the details of the incident in client’s work | | | | |
| Action(S) taken or suggested if any (Legal, psychosocial, Medical | | | | |
| Case Studies | | | | |
| Alleged Perpetrator’s Information | | | | |
| Name | | | | |
| Date of Birth | |  | | |
| Sex | |  | | |
| Nationality | |  | | |
| Residential Address | |  | | |
| Occupation | |  | | |
| Date of Complain | |  | | |
| Mobile Number | |  | | |
| Place of Incident | |  | | |
| Date of Incident | |  | | |
| Alleged Perpetrator’s relationship to survivor  \_\_\_\_\_\_\_Supervisor/ Employer \_\_\_\_\_\_\_No relation  \_\_\_\_\_\_\_\_Co-Worker \_\_\_\_\_\_\_unknown  \_\_\_\_\_\_\_\_Community Worker \_\_\_\_\_\_\_Others  \_\_\_\_\_\_\_\_Vaccinator  \_\_\_\_\_\_\_\_\_Project Staff | | | | |
| Alleged Perpetrator’s account of the incident | | | | |

**Annex 4: SEA/SH, Child Abuse/Exploitation and Child Protection Code of Conduct**

Contractors’ employees including managers are obliged to create and maintain an environment which prevents SEA/SH and Child Abuse/Exploitation (CAE) issues, and where the unacceptability of SEA/SH and actions against children are clearly communicated to all those engaged on the project. In order to prevent SEA/SH and CAE, all employees and sub-contractors will be required to sign an individual Code of Conduct confirming their agreement to support SEA/SH and CAE activities. (***See Child Protection Safe Guiding Policy from the MoGCSP***).

Similarly, all sub-contractors must be familiar with their roles and responsibilities in upholding the SEA/SH and CAE Codes of Conduct and are therefore required to attend an induction training course prior to commencing work on site to ensure that they are. This training will be separate from the induction training course required of all employees and will provide employees/Contractors/Sub-contractors with the necessary understanding and technical support needed to develop the plans for addressing SEA/SH issues.

SAMPLE COMMITMENT:

I..................... do hereby acknowledge that I have read the foregoing Code of Conducts, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to Sexual Exploitation and Abuse (SEA/SH), Child Abuse and Exploitation (CAE), Child Protection Code of Conduct (CPCC)/Safe Guiding Policy. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action.

FOR THE EMPLOYER

Signed by: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name / Date:

**Guiding principles:**

1. Acts of SEA/SH constitute serious misconduct and may therefore result in sanctions, including penalties and/or dismissal, and, if appropriate, referral to the police for further action.
2. All forms of GBV, SEA, and SH, including against children, are unacceptable, whether they take place in the workplace, surrounding area, or in the community.

* 1. Sexual harassment -for example, making unwanted sexual advances, asking for sexual favors, or engaging in verbal or physical behavior with a sexual connotation, including subtle acts, is prohibited.
  2. Sexual exploitation and abuse – any abuse or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes is prohibited.

The acts of discrimination, harassment, and violence below are strictly prohibited and severely punished:

1. Any act of discrimination in interactions with the local community or between project personnel on the basis of race, color, sex, age, religion, language, marital status, family status, political belief, national, ethnic or social affiliation, physical or mental disability, birth, sexual orientation, gender identity, or other status.

1. Any act of sexual harassment, or inappropriate, harassing, threatening, abusive, sexually provocative, degrading or culturally inappropriate language or behavior.

1. Any act of violence, including sexual and/or gender-based violence, which may cause physical, psychological, or sexual suffering, the threat of such acts, coercion, and deprivation of liberty.

1. Any act of exploitation or abuse of power, including sexual exploitation and abuse, such as exchanging money, employment, goods, or services for sex, which includes sexual favors or other forms of humiliating, degrading, or abusive behavior.

1. The employment and exploitation of children within the company, which includes the sexual abuse or other inappropriate behavior towards children, including sexual abuse and early marriage; in addition, the safety and protection of children in the project areas and also in the vicinity of construction sites and project activity areas must also be ensured.

The commission of prohibited acts listed above will be immediately sanctioned by dismissal from the first observation of the fault, with transmission of the characteristic elements of the fault for legal proceedings by the competent public authority if it is reported and referred (with the informed consent of the survivor).

In addition, any act of harassment having as its object or effect a degradation of the working conditions likely to infringe the rights and dignity, to alter his/her physical health or compromise his professional future, will be liable to disciplinary sanction for any employee.

The employee acknowledges that participating in acts of GBV, SEA and SH while employed by the project – whether in the workplace, in the vicinity of the workplace, or in the communities bordering the areas where the project activities take place – constitutes a violation of the Liberian legislative framework. Specifically, Part II, 14 subchapter D of the penal code of Liberia Code speaks strongly against the occurrence of sexual offense. There are also other instruments such as the Rape Law, Domestic Violence Law[[1]](#footnote-2) that prohibits sexual violence.

Consequences of violating the Code of Conduct

Violation of this Code of Conduct by the staff of the LWEP or sub-contractor may result in serious consequences, including warning, suspension, termination or possible referral to legal authorities. The outcome of investigations when cases are reported will determine which sanctions to be applied.

**Penalties:**

I understand that if I violate this Individual Code of Conduct, my employer will take measures disciplinary and proportionate to the nature of the violation committed which could include:

1. Two (2) Informal Writing
2. Formal Warning
3. Training complementary to the prevention of GBV, SEA and SH.
4. The loss of one week's salary.
5. The suspension of the relationship of work (without balance), for a period minimal of one month and a period maximum of six months.
6. Dismissal.
7. Referral to the police or other authorities, if necessary, only with the consent of the survivor.

### Sample Commitment

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ certify that I have read and understood the contents above and commit to abide by this SEA/SH Code of Conduct at all times and also accept the penalties herein if violated.

Institution: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Email address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Unit: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Mobile number: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Annex: 5 MoGCSP GBV/SEA/SH/Support Services, Referral Pathway and Partners**

A National Action Plan to prevent and manage SEA/SH and GBV in project communities and workplace has been developed by the Government of Liberia through a multisectoral to holistically respond through care and services for survivals as indicated below.

|  |  |  |
| --- | --- | --- |
| SEA/SH Concentration | Agencies | Partners |
| Psychosocial and Coordination | Ministry of Gender, Children and Social Protection | Psychosocial  THINK, ARC, MSF-B WIPNET, UN Women, UNFPA, UNICEF, WHO, UNHCR, SCF (UK), OXFAM, CF, Medica Liberia, Christian Empowerment and sustainable Program, (CESP) Mother Pattern Collage of Health Science, Women Health and Development Program, Borough Women and Girls Empowerment Program, Women AID INC. NRC, International Rescue Committee (IRC), Equip, WHDP/MPCH, Action Aid, YWCA  Coordination  MOJ, MOH, MOE, NRC, GBV/SEA/SH Task Force from all Counties, LNP, UNICEF, UNDP, UNHCR, UNFPA, UN Women, Medica Liberia |
| Legal and protection | Ministry of Justice | MOJ, MOH, MOE, NRC, GBV/SEA/SH Task Force from all Counties, LNP, UNICEF, UNDP, UNHCR, UNFPA, UN Women, |
| Health | Ministry of Health | International Rescue Committee (IRC), National Association on traditional Practices Affecting the Health of Women and children (NATPAH) Inc., Women Health and Development (WHD) Merlin, Think, MSB-B, Liberia National Red Cross Society (LNRCS), SCF, American Refugee Committee (ARC), UNFPA, Medica Mondale Liberia, Ministry of Education, Merlin-Liberia, UNICEF |

Already available Support services in the project area as indicated above will be accessed through LWEP reference, networking, and in coordination with other key actors. It is in the interest of the project team to also identify additional key service providers beforehand and provide a referral pathway for the project beneficiaries, workers and nearby communities. The support services, include amongst others:

1. Provision for accessible information on services available to survivors of SEA/SH;
2. Provision of accessible, effective, and responsive health, social welfare, police, prosecutorial, and other services to redress cases of SEA/SH;
3. Provision of specialized facilities, including support mechanisms for survivors of SEA/SH; and
4. Provision of effective rehabilitation and reintegration programs for perpetrators of SEA/SH.

**Annex 6: References**

1. The National Gender Policy of Liberia-2009
2. The 1986 Constitution of Liberia
3. The Convention on the Elimination of All Forms of Discriminations Against Women (CEDAW).
4. The African Charter on Human and Peoples’ Rights (Banjul Charter).
5. Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol).
6. UN (2003) Secretary-General’s Bulletin: Special Measures for Protection from Sexual Exploitation and Sexual Abuse, Section 1. New York: UN.
7. *UN (2020) United Nations protocol on allegations of sexual exploitation and abuse involving implementing partners, page 1-2.*
8. WB (2020) Good Practice Note on Addressing Gender Based Violence in Investment Project Financing involving Major Civil Works, page 7. WB 2018, page 3.
9. The panel law-Tittle 26-Liberian Code of Laws Revised

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1. [↑](#footnote-ref-2)