

**Transmission Infrastructure Development Project for  
Southern Area of Chattogram Division and Bangabandhu Hi-Tech City at Kaliakair Project**

# **Gender-Based Violence Prevention Plan**

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## Table of Contents

|  |    |
|--|----|
| 1. Introduction.....   | 1  |
| 2. Country and Sector Context .....  | 2  |
| 2.1 Female Labor Force Participation in Bangladesh .....   | 2  |
| 2.2 Gender-Based Violence in Bangladesh.....   | 2  |
| 2.3 Status of Gender Based Violence (GBV) in Cox’sBazar (CXB).....   | 3  |
| 2.4 Legal and Institutional Environment for Gender Equality and GBV Prevention in Bangladesh.....                          | 4  |
| 3. Potential SEA/SH Risks Assessment in the Project Areas.....   | 5  |
| 4. GBV Prevention Plan .....   | 6  |
| 4.1 Grievance Mechanism.....   | 7  |
| Annex I.....   | 15 |
| Sample Labor Code of Conduct covering the GBV/SEA/SHA related risks.....   | 15 |
| Annex II.....  | 18 |
| GBV service providers functioning in Bangladesh during COVID-19.....   | 18 |
| Annex III.....   | 19 |
| Project Grievance Mechanism to address SEA/SH Allegations (this model will be further tailored to the project needs) ..... | 19 |
| Annex IV .....   | 20 |
| Operating Procedures and Response Protocol for SEA/SH Allegations.....   | 20 |

# Gender-Based Violence Prevention Plan

## 1. Introduction

Power infrastructure of Bangladesh is small and insufficient but the demand is rapidly increasing. Only 72% people have access to electricity and the growth rate is 12%. In Bangladesh, total electric power, generated from the power plants is first supplied to the national grid then to the whole country through national grid. In spite of increasing the power generation in a considerable amount, our power system does not meet the goal and still we have a large amount of power shortage. Considering the above context, Power Grid Company of Bangladesh Limited (PGCB) has allocated funds in assistance with AIIB for “Transmission Infrastructure Development Project for Southern Area of Chattogram Division and Bangabandhu Hi-Tech City at Kaliakair Projects” which will support to meet the rapidly growing demands of residential, commercial and industrial consumers in Southern Area of Chattogram Division and Bangabandhu Hi-Tech City at Kaliakair and adjacent areas.

To distribute uninterrupted and quality power in Chattogram, Cox’s Bazar, and Gazipur area new substations and associate transmission lines are going to be constructed in that area.

*Table 1: Project Components*

| Name of Substations   | Land Size (acre) | SS Type | Required Bays  | Associated Transmission Lines  | Length (Km) |
|---|------------------|---------|--|--|-------------|
| 230/132/33kV SS:<br>Anwara<br>2x250/350 MVA<br>(230/132kV)<br>2x80/120 MVA<br>(132/33kV)<br>(Future 400 kV Provision) | 20               | GIS     | 230kV: LB=8; TB=2;<br>BCB=1<br><br>132kV: LB=2; TB=4<br><br>33kV: TB=2 | Anwara-Cox’s Bazar (N) 230kV double circuit line (Initially Charged at 132kV)  | 109         |
| 132/33kV GIS Substation:<br>Cox’s Bazar<br>3x80/120 MVA<br>(Future 230 kV Provision)                                  | 10               | GIS     | 132kV: LB=8;<br>CBB=2; TB=3;<br>Spare=1; BCB=1<br><br>33kV: TB=3       | Anwara-Cox’s Bazar (N) 230kV double circuit line (Initially Charged at 132kV)<br><br>LILO of Dohazari-Cox’s Bazar 132kV four circuit transmission line | 1.55        |
| 132/33kV GIS Substation: Teknaf<br>2x80/120 MVA   | 5                | GIS     | 132kV: LB=2; TB=2;<br>BCB=1<br>33kV: TB=2                              | Cox’s Bazar to Teknaf 132 kV double circuit transmission line  | 65          |
| 230/33kV GIS Substation:<br>BHTC<br>2x125/140 MVA   | 5                | GIS     | 230kV: LB=2; TB=2;<br>BCB=1<br><br>33kV: TB=2                          | Existing Kaliakair SS to BHTC 230kV double circuit transmission line (230kV Bay Extension at Kaliakair: 2 Nos.)  | 4.88        |
| 4 Nos.  | 40               |         |  | Total (Transmission Line)  | 180.43      |

## 2. Country and Sector Context

Energy shortage has differential impacts on women, and it is a critical constraints on economic development and the quality of life for women in both urban and rural areas. Although poverty reduction and energy access have a direct linkage to each other, most of the time, poverty reduction and gender-related projects do not take this into consideration and the linkages with women's development and empowerment are not made. Since women have an important role to play in energy systems through their subsistence and productive tasks, they are also most affected by energy poverty. Projects, which in some cases have not been successful due to the failure to consider the distinct situations of women and men in relation to energy production and use patterns. In addition, decisions concerning technical and other aspects of projects often only consider male views. There are a few key gender issues regarding energy: women's workloads and time-use; health impacts of cooking, water, and sanitation; security and lighting; energy use in productive activities; access to information; gender-neutral project design in the energy sector; and the lack of women in technical education and professions. All these aspects highlight the need for improved policy and measures related to energy access that are essential for achieving overall well-being and equity for women, confirming that energy is a "critical enabler." This means that access to clean and affordable energy services enables women to improve their health and expand their livelihood opportunities, children can study better, and the opportunity for women to earn income is enhanced.

### 2.1 Female Labor Force Participation in Bangladesh

Bangladesh's female labor force participation (FLFP) has risen substantially; yet, FLFP and quality of jobs for females are still lagging<sup>1</sup>. There have been remarkable improvements in FLFP made in Bangladesh in recent decades, raising the FLFP rate from 26 percent in 2002 to 35.6 percent in 2016<sup>2</sup>, benefiting from the expansion of garment manufacturing industries. Yet, by comparison, male labor force participation is much higher at over 80 percent<sup>3</sup>. Moreover, the improvement in FLFP rates has hit a plateau, remaining at 36 percent in 2017. This gender disparity can be attributed to structural barriers including women's domestic burden, sex segregation in educational subject and occupation, employer discrimination, restricted mobility, limited access to trainings, lack of female friendly facilities, sexual harassment at work, limited childcare provisions. Social norms that influence and limit women's choices as well as a lack of a supportive policy environment also stunts FLFP. Moreover, female employment tends to be more concentrated in low-paid and low-productivity occupations, which are more vulnerable to technology innovation and automation in the production process<sup>4</sup>. Increasing women's labor force participation and improving the quality of female employment will require more significant support for women's access to employment opportunities and high-quality skills development programs.

### 2.2 Gender-Based Violence in Bangladesh

Violence against women (VAW) is one type of GBV which is very prevalent in Bangladesh and is often rooted in gender inequalities and harmful gender norms. VAW in Bangladesh is still very high. Report on Violence against Women (VAW) Survey 2015 jointly conducted by the Bangladesh Bureau of Statistics (BBS) and UNFPA found that 73% of married women in Bangladesh have experienced forms of violence from their husband, 55% reported forms of violence in the past 12 months, and 50% reported physical violence in their lifetime. More than 10 million Bangladeshi women experience physical or sexual

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<sup>1</sup> Labor Force Survey, BBS 2010, 2016/17

<sup>2</sup> World Bank calculations based on LFS 2016 data, page xvii

<sup>3</sup> Share of female youths in NEET is also much higher (47%) compared to male (10%). ILO. (2020). Global Employment Trend.

<sup>4</sup> Raihan, S., & Bidisha, S. H. (2018). Female employment stagnation in Bangladesh. Dhaka.

violence every year. The numbers may be higher but societal stressors often prevent victims of rape and domestic abuse to step forward. Cybercrimes have added a new element to VAW. The Counter Terrorism Unit of Bangladesh Police reported a rapid rise in cases filed with their Cyber Crime Unit, (845 in 2018 up from 566 in 2017) of which 70% of the victims were women and children.

The worst manifestation or existing forms of GBV is child marriage, also known as early marriage. Child marriage and the dowry system puts girls at particular risk of sexual, physical and psychological violence throughout their lives. Bangladesh has one of the highest early marriage rates in the world at 59 percent in 2018 (UNFPA, 2019).

Early marriage nearly always results in school drop-outs or from to pursuing higher education and early childbirth, and is often used as a way for trafficking young girls. This is hazardous from a health perspective and is a hindrance to academic and economic development.

### 2.3 Status of Gender Based Violence (GBV) in Cox'sBazar (CXB)

The provision of GBV services to the host communities in CXB has been limited. Only the One Crisis Center (OCC) at District Sadar Hospital (DSH) and a one stop cell at Ramu and two at Ukhiya and Teknaf to serve the host communities. These are operated under the Multisectoral Program on Violence Against Women (MSPVAW) led by the Ministry of Women and Children Affairs (MOWCA) in coordination with eleven other ministries and law enforcement, and legal agencies/organizations. The remaining services are dedicated to displaced Rohingya women and children. However, the GBV issues are also serious among the local population and services to them are badly needed as well. A survey on violence against women conducted by the Bangladesh Bureau of Statistics in 2015 found that 48 percent of ever-married women in Chittagong division had experienced physical and/or sexual violence - with 22% reporting an experience in the preceding 12 months. Additionally, a recent assessment of GBV services in CXB district carried out by humanitarian agencies found gaps in vital health services such as the clinical management of rape, in addition to a marked lack of safe space programming for women and girls, including age-appropriate GBV services for adolescents. CXB currently lacks integrated GBV and health care provision across the district.

The vulnerability of displaced Rohingya women and girls (52% of refugees) to various risks, including GBV, is high. UN agencies and local non-government organizations (NGOs) report high levels of GBV among the Rohingya women<sup>5</sup>. Psychosocial distress is acute and ongoing, as the Displaced Rohingya People (DRP) have witnessed horrific violence in Myanmar. While more women are now working as volunteers and group leaders, stepping out of the confines of their homes, stringent social norms and fear of sexual assault and trafficking limit their role in the public sphere and opportunities for economic activity. DRPs are reported to suffer from the flashback of the massacre, anxiety, acute stress, recurring nightmares, sleep deprivation, eating or even speaking disorder due experience or witness of methodical rape on women and girls and violent deaths of family members. There has been increase in the incidence of sexual violence among the refugees in Bangladesh which was exacerbated by the unavailability and low quality of post-rape care services. From the end of August 2017 to the end of February 2018, MSF has treated 226 survivors of sexual violence at MSF's Sexual and Reproductive Health Units, out of which 162 of them were rape survivors. Majority of the survivors were below 18 years<sup>6</sup>. Children face the danger of long-term psychological and social distress. Since DRPs are dependent on the humanitarian

<sup>5</sup><https://reliefweb.int/sites/reliefweb.int/files/resources/briefing-violence-against-rohingya-women.pdf>

<sup>6</sup>Médecins Sans Frontières. Bangladesh: Activities update on Cox's Bazar. Geneva: MSF; 2018.

assistance for their survival and struggle daily for food assistance, this acts as a stressor for majority of them as well.

## 2.4 Legal and Institutional Environment for Gender Equality and GBV Prevention in Bangladesh

**Existence of laws and regulations as well as mechanisms helps to address SEA/SH risks.** Bangladesh has the following mechanisms for SEA/SH/GBV/VAC mitigation, prevention and response.

- The National Women’s Development Policy (NWDP), 2011 seeks to reduce violence; eliminate discrimination; increase access to education, health and employment; and address the special needs of older women, women with disabilities and women from indigenous and marginalized communities.
- In early 2017, the Parliament of Bangladesh reviewed the Child Marriage Restraint Act 2016 to permit under-18 girls to be married under “special circumstances”. This has raised serious concerns among women’s groups and legal NGOs working in the country.
- The Multi-Sectoral Program on Violence against Women (MSPVAW)<sup>7</sup> is being implemented jointly by the Government of Bangladesh and Government of Denmark under the Ministry of Women and Children Affairs. The project is being carried out in collaboration with the Ministry of Law, Justice and Parliamentary Affairs, Ministry of Information, Ministry of Social Welfare, Ministry of Home Affairs, Ministry of Health and Family Welfare, Ministry of Education, Ministry of Religious Affairs, Ministry of Youth and Sports and Ministry of Local Government, Rural Development and Cooperative. One of the significant components of the program is the OCC in the Medical College Hospitals (MCHs). The OCCs provides health care, police assistance, DNA test, social services, legal assistance, psychological counseling and shelter service etc. A training module for combating VAW was developed for OCC staffs, teacher, students, health assistant, family planning officers and other professions. Another intervention set up by the MSPVAW is the National Helpline Center for violence against women, a 24-hour helpline that can be accessed from land lines and mobile numbers.<sup>89</sup>
- A High Court decision declared in 2009 that the sexual harassment of girls and women is illegal, and issued a set of guidelines defining sexual delinquency to prevent any kind of physical, mental or sexual harassment of women, girls and children at their workplaces, educational institutions and other public places including roads across the country<sup>10</sup>.
- Bangladesh’s laws do address the use of corporal punishment in school settings; and in 2010 the Ministry of Education released an Education Circular that forbids corporal punishment in classrooms and schools. This same ban does not, however, extend to alternative care institutions, penitentiary settings or as punishment for specific criminal offenses.

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<sup>7</sup> Website of Multi Sectoral Project; [www.mspvaw.gov.bd](http://www.mspvaw.gov.bd)

<sup>8</sup> Ministry of Women and Children Affairs, Government of People’s Republic of Bangladesh. Multi-Sectoral Programme on Violence Against Women. DOI: <http://www.mspvaw.gov.bd/>, accessed on May 15, 2016

<sup>9</sup> Pande, R. P., Nanda, P., Bopanna, K., & Kashyap, A. (2017). Addressing Intimate Partner Violence in South Asia: Evidence for Interventions in the Health Sector, Women’s Collectives, and Local Governance Mechanisms. New Delhi: International Center for Research on Women.

<sup>10</sup> Chancery Law Chronicles <http://www.clcbd.org/content/print/36.html> (Accessed 29th March 2020)

- Bangladesh legislated an 'ICT Act' in 2006 to combat cybercrime and online harassments. However, the provisions of this Act are quite insufficient to undertake legal measures appropriately as it does not address gender-based violence online in a clear and effective manner. The country has also formed a 'Cybercrime Tribunal' that addresses cyber violence<sup>11</sup>.
- Other than NWDP, the government has enacted a number of stringent laws and policies to protect men and especially women from gender based violence (GBV) including sexual exploitation and abuse/sexual harassment (SEA/SH): The Criminal Procedure Code, 1889; The Penal Code 1860; The Evidence Act 1972; Child Marriage Restraint Act 1929; Citizenship Act 1951 (Amended 2009); Muslim Family Laws Ordinance 1961; Dowry Prohibition Act 1980; Immigration Ordinance 1982; Immigration Ordinance 1982; Family Court Ordinance 1985; Women and Children Repression Prevention Act 2000 (2003); Acid Crime Prevention Act,2002;Acid Control Act 2002;The Bangladesh Labor Act 2006;Domestic Violence (Prevention & Protection) Act 2010;Human Trafficking Deterrence and Suppression Act, 2012;The Pornography Control Act, 2012; The Hindu Marriage Registration Act 2012. Multi-Sectoral Program on Violence against Women is being implemented jointly by the Government of Bangladesh and Government of Denmark under the Ministry of Women and Children Affairs. One of the significant components of the program is the OCC (One Stop Crisis Centre) in the Medical College Hospitals (MCHs). The OCCs provide health care, police assistance, DNA test, social services, legal assistance, psychological counseling and shelter service etc.

### 3. Potential SEA/SH Risks Assessment in the Project Areas

Considering the linear type of project, the project is expected to have minor labor influx. Project will construct around 180 km TLs and it is expected that total labor including the skilled and unskilled will not be more than 500 for the entire TLs. At one location, the number of labor is estimated maximum 50 and among the 50% will be unskilled labor.

Construction of substations may require more labor compared to the TLs and most of the sub-stations will be constructed in peri-urban or urban areas where regular monitoring will be possible. All the construction camps will be constructed within the proposed sub-station areas.

However, based on the social assessment, few GBV risk are identified as below:

- All the construction related activities will be conducted at this COVID situation and it may be difficult to monitor the activities on a regular basis.
- Labor/workers have lack of knowledge on national laws and policies, and actions incase of GBV issues
- Regarding lowest distance, boundary of Camp 01E is about 225-meter, Camp 07 about 330-meter, Camp 08E about 227-meter away from proposed transmission line. Cox's Bazar to Teknaf Highway is located between the Camps and proposed transmission line. It was found that about 6.10km of transmission line (AP 47 to AP 59) will pass with the periphery of Kutupalong Rohingya Camps. So, construction of transmission line may impact on Rohingya Camps, where both project labor and Rohingya female may be at risk of GBV.

<sup>11</sup> <https://www.genderit.org/articles/cyber-violence-against-women-case-bangladesh> (Accessed 3rd April 2020)

- Contractors have lack of experience in management of GBV issues.
- There are currently limited awareness raising programs on GBV/SEA/SH in energy sectors in Bangladesh.
- There are significantly more male labor than female labor in the energy infrastructure construction sector.
- Due to the constraints placed by the current COVID-19, further consultations need to be conducted to gauge GBV concerns from stakeholders.
- Job opportunities of local women and girls are generally limited. However, with civil work in the neighborhood, they may avail job opportunities in the project area and as a result be victims of SEA and workplace SH.
- Higher wages for workers in the local community can lead to an increase in transactional sex including incidents of sex between laborers and minors.
- Civil work projects can cause shifts in power dynamics between community members and within households. Male jealousy, a key driver of GBV, can be triggered by labor influx on a project when workers are believed to be interacting with community women, or community women are getting better wages than their male members of the family. This may lead to abusive behavior within the homes of those affected by the project.
- Not all GBV service providers have the capacity or the capability to provide phone-based remote service delivery during emergencies such as the current COVID-19 pandemic, where normal life is severely impacted. This could entail a lack of hotlines, adequate call representatives to receive cases, mechanism to file and track GBV cases and status of remote delivery, distance from GBV survivors etc.

#### 4. GBV Prevention Plan

The GBV Prevention Plan takes a comprehensive approach to include both prevention and mitigation measures as the existing policies and measures on mitigation are limited to address GBV. The proposed project involves construction work in the project implemented areas which may have the potential GBV risks in four areas: sexual exploitation and abuse, workplace sexual harassment, and non-sexual exploitation and abuse. Therefore, the purpose of this action plan is to identify the issues, stakeholders, possible service providers and assess their capacity that aid in accessing grievance redressal. The action plan will focus on some corresponding mitigation measures—sensitizing the communities and other stakeholders, strengthening the institutional capacities— to mitigate project related potential risk of GBV in the projectaffected population.

A survivor-centric approach will be followed - all through, victim/survivors' care and providing access to different referral mechanisms are considered key aspects of this plan. The approach aims to create a supportive environment in which each survivor's rights are respected and in which the person is treated with dignity and respect.

The project will include a general Code of Conduct (CoC) as well as a Labor Code of Conduct (sample given in Annex I), covering the GBV/SEA/SH related risks for the contractors, sub-contractors, and laborers who will be employed under the project.

## 4.1 Grievance Mechanism

The PIU/ESU will use the existing GRM system with due consideration for confidentiality in case management of GBV issues.

The GBV/SEA/SH allegations can be reported, just like any other project-related grievance, using a regular project-level GRM channel (see Annex III for illustration). The GRM focal person of the PMU will link the complainant with the selected service provider (see Annex II) who will be given responsibility to make the link between the survivor and other local service providers with the consent of the complainant, special emphasis will be given to those who are mainly active remotely in COVID situation. To make the GRM more responsive to SEA/SH and GBV issues, an information sharing protocol with GBV service providers will be developed so that survivor related information is carefully managed, and confidentiality is maintained. A response protocol, reporting of allegation procedures and response framework of the GRM is attached (Annex IV), which follow a six-step value chain (1) uptake; (2) sort and process; (3) acknowledge and follow up; (4) verify, investigate, and act; (5) monitor and evaluate; and (6) provide feedback to the complainant. To respond the COVID situation, GRM will incorporate hotlines, place community leaders and facilitate community 'help centre' to ensure access to service provision and to promote safety and well-being of women and girls in need.

## GBV Prevention Plan

| Action  | Activities   | Indicator   | Responsibility                | Risk Management   |
|---|--|---|-------------------------------|---|
| Awareness raising campaign on SEA/SH in project and trainings | <p>Prepare relevant communication materials on GBV/SEA/SH and dissemination of these materials.</p> <p>Conduct 4 awareness raising workshop in the project areas</p> <p>Develop content and conduct targeted training and orientation session:</p> <ul style="list-style-type: none"> <li>- Training/orientation sessions to sensitize IAs on importance of addressing GBV/SEA/SH risks on the project and the mechanisms that will be implemented.</li> <li>- Training/orientation session to sensitize other stakeholders on the importance of addressing GBV/SEA/SH risks including cyber bullying. The training will be targeted at stakeholders identified in SEP.</li> </ul> | <p>Communication material related to GBV/SEA/SH disseminated</p> <p>Awareness raising campaign on GBV/ SEA/SH conducted among all stakeholders</p> <p>Number of project actors trained and oriented on GBV/SEA/SH</p> | Social Monitor* and PIU -PGCB | Monitor the activities and provide additional guidance as necessary |

| Action   | Activities   | Indicator  | Responsibility                   | Risk Management  |
|--|--|--|----------------------------------|--|
| Capacity building for labors, contractors, sub-contractors and stakeholders on anti-GBV/harassment policies.   | <ul style="list-style-type: none"> <li>Basic ethics and CoC; Contractors, consultants, labor, sub-contractors and community people’s rights and responsibilities, positive discipline.</li> <li>Prepare Code of Conduct (CoC)</li> <li>Measures for dealing with GBV, complaints and reporting mechanisms, services for survivors, referral mechanisms and redress procedures;</li> </ul> <p><i>Topics to be covered under the trainings can be determined through consultations on training needs</i></p> | <ul style="list-style-type: none"> <li>CoC is prepared</li> <li>All contractors, labor and relevant stakeholders are aware of the CoC</li> </ul> | Social Monitor and ESU-PGCB      | Monitor the activities and provide additional guidance as necessary.         |
| Sensitize the PGCB and PIU to the importance of addressing GBV on the project, and the mechanisms that will be implemented.  | Develop deep-dive trainings to build capacity of PGCB on safeguarding mechanisms including CoC, GRM, GBV response protocols on and reporting and procedures to handle cases.   | Deep-dive trainings conducted.   | Social Monitor                   | Monitor the activities and provide additional guidance as necessary.         |
| Organize stakeholder consultations with project actors and community members to inform them properly about the potential GBV risks and project activities to address GBV related issues. | Consultations carried out with different stakeholders and local communities. Share the GBV risk of the project with the relevant stakeholders. Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited.  | # of project actors and community members sensitized   | Contractor and PIU               | Monitor the implementation of Stakeholder Engagement Plan.                   |
| Functionalize effective GBV GRM  | As the SEP explicitly entails addressing GBV/SEA/SH, ensure beneficiaries, community members and labor are informed of GBV grievance mechanisms.<br><br>Map local services providers in project affected areas and develop referral protocol to GBV response services (See   | Availability of an effective GRM with multiple channels to initiate a complaint / parallel GBV.  | PIU, Social Monitor and ESU-PGCB | Ongoing monitoring and reporting on GRM to verify it is working as intended. |

| Action  | Activities  | Indicator  | Responsibility                           | Risk Management                                    |
|---|---|--|--|--|
|   | <p>Annex II for list of service providers functioning during COVID-19 lockdown.)</p> <p>Train personnel to operate GRM i.e., proper documentation for complaint registration and management; and confidential reporting with safe and ethical documenting of GBV cases.</p> <p>Communicate with local service provider to provide referral and support services to survivors as per Grievance Mechanism guidance on SEA/SH.</p> <p>Organize a stakeholder engagement with CSOs to ensure that they are aware.</p> |  |  |  |
| Clearly define the GBV requirements and expectations in the bidding documents for contractor                          | <p>Formulate and adopt GBV informed bidding document.</p> <p>Inform the contractors and provide orientation</p> <p>Include GBV costs in the bill of quantities</p>  | GBV requirement and expectation are adapted in bid document.   | PIU-PGCB and ESU                         | Review by AIB                                      |
| Codes of Conduct (CoC) signed and understood by all those engaged in the project directly receiving project financing | <p>CoC finalized and agreed on. (See Annex 1 for sample of code of conduct)</p> <p>Sensitize project related staff about CoC requirements and obligations.</p> <p>Ensure requirements in CoCs are clearly understood by those signing.</p> <p>Have CoCs signed by all those with a physical presence at the project site.</p> <p>Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.</p>  | <p># of project-related staff trained and oriented on CoC.</p> <p># of project-related staff who signed CoCs</p> | Social Monitor, PIU-PGCB and ESU of PGCB | Review implementation during supervision missions. |
| Codes of Conduct (CoC) for all  | CoC finalized and agreed on. (See Annex I   | # of project-related   | Contractor and                           | Review implementation                              |

| Action  | Activities   | Indicator  | Responsibility              | Risk Management  |
|---|--|--|-----------------------------|--|
| laborers signed and understood  | <p>for sample of code of conduct)</p> <p>Sensitize project related workers about CoC requirements and obligations.</p> <p>Ensure requirements in CoCs are clearly understood by those signing.</p> <p>Have CoCs signed by all those with a physical presence at the project site.</p> <p>Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.</p> | <p>laborers trained and oriented in CoC</p> <p># of laborers who signed CoCs</p> | Social Monitor              | during supervision missions.   |
| Accountability and response framework for SEA/SH allegations related to CoC in place. | <p>Create an accountability and response framework for how allegations of SEA/SH that breach the CoC will be handled and the commensurate disciplinary measures.</p> <p>Sensitize project related staff and laborers about what constitutes as CoC breaching.</p> <p>Ensure repercussions are understood by project related staff and workers.</p> <p>Concrete disciplinary measures created.</p>      | Record of # of cases and disciplinary actions taken if breach in CoC             | PIU-PGCB and Social Monitor | Monitor the effective implementation of the SEA/SH accountability and response framework should an allegation come forward |
| Implement appropriate project related civil works for labor to reduce GBV risks.      | <p>Have separate, safe and easily accessible facilities for women and men working on the site. Include security measures such as ensuring adequate security personnel.</p> <p>Locker rooms and/or latrines should be located in separate areas, well-lit and include the ability to be locked from the inside.</p>   | Documentation of measures taken to reduce GBV risks.                             | Contractor, PIU             | Ongoing reporting  |

Gender-Based Violence Prevention Plan

| Action  | Activities   | Indicator   | Responsibility                   | Risk Management  |
|---|--|---|----------------------------------|--|
|   | Visibly display signs around the project site (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited.                                       |   |                                  |  |
| Undertake regular M&E of progress on GBV activities.  | <p>Conduct M&amp;E field visits.</p> <p>Review quarterly the action plan and progress against indicators listed</p> <p>Provide quarterly report</p>  | <p>Successful implementation of agreed GBV Action Plan (Y/N).</p> <p>Quarterly report</p> | PIU, Social Monitor, contractors | Ongoing reporting  |
| Improve safety of project-related civil works for labor to reduce GBV risks during construction works | <ul style="list-style-type: none"> <li>• Improve lighting around project area</li> <li>• Follow up refurbishment construction activities (Safely demarcated (appropriate signage, lighting)</li> </ul> | Clearly demarcated and well-lit spaces.   | PIU and contractors.             | Monitor the activities and provide additional guidance as necessary. |

\* The social monitor will coordinate with the RISA regarding the implementation of this plan.

## Annex I

### Sample Labor Code of Conduct covering the GBV/SEA/SHA related risks

#### Introduction

The company is committed to ensuring a work environment which minimizes any negative impacts on the local environment, communities, and its workers. The company also strongly commits to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) have no place, and where they will not be tolerated by any employee, sub-contractor, supplier, associate, or representative of the company. The purpose of this *Code of Conduct* is to:

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

#### Definitions

##### **Sexual Exploitation and Abuse (SEA)**<sup>12</sup>

Is defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another<sup>13</sup>.

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

##### **Sexual Harassment:**<sup>14</sup>

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

##### **Sexual Harassment versus SEA**<sup>15</sup>

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

**Consent** is the choice behind a person’s voluntary decision to do something. Consent for any sexual activity must be freely given, ok to withdraw, made with as much knowledge as possible, and specific to the situation. If agreement is obtained using threats, lies, coercion, or exploitation of power imbalance, it is not consent. **Under this Code of Conduct<sup>16</sup> consent cannot be given by anyone under the age of 18, regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of the child is not a defense.**

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<sup>12</sup> As defined in the UN Secretary’s bulletin – Special Measures for protection from sexual exploitation and abuse October, 9, 2003 ST/SGB/2003/13

<sup>14</sup> Inter-Agency Standing Committee *Protection against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community-based complaint mechanism. Global standard Operating Procedures.* May 2016

<sup>15</sup> Ibid

<sup>16</sup>In accordance with the United Nations Convention on the Rights of the Child.

There is no consent when agreement is obtained through:

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

**While all forms of violence against a community resident or a co-worker are forbidden, this code of conduct is particularly concerned with the prevention and reporting of sexual exploitation and abuse (SEA) and sexual harassment which constitute gross misconduct, are grounds for termination or other consequences related to employment and employment status:**

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

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

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

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

**Individual signed commitment (to be translated in a language understood by the person signing):**

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

I agree that while working on the project I will:

- Treat all persons, including children (persons under the age of 18), with respect regardless of sex, race, color, language, religion, political or other opinion, national, ethnic or social origin, gender identity, sexual orientation, property, disability, birth or other status.
- Commit to creating an environment which prevents SEA and SH and promotes this code of conduct. In particular, I will seek to support the systems which maintain this environment.

- **Not** participate in SEA and SH as defined by this *Code of Conduct* and as defined under (country) law (and other local law, where applicable).
- **Not** use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- **Not** participate in sexual contact or activity with anyone below the age of 18. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense. I will not participate in actions intended to build a relationship with a minor that will lead to sexual activity.
- **Not** solicit/engage in sexual favors in exchange for anything as described above.
- Unless there is the full consent by all parties involved, recognizing that a child is unable to give consent and a child is anyone under the age of 18, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” under this Code.

**I commit to:**

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

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

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

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

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

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

Printed Name: \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

## Annex II

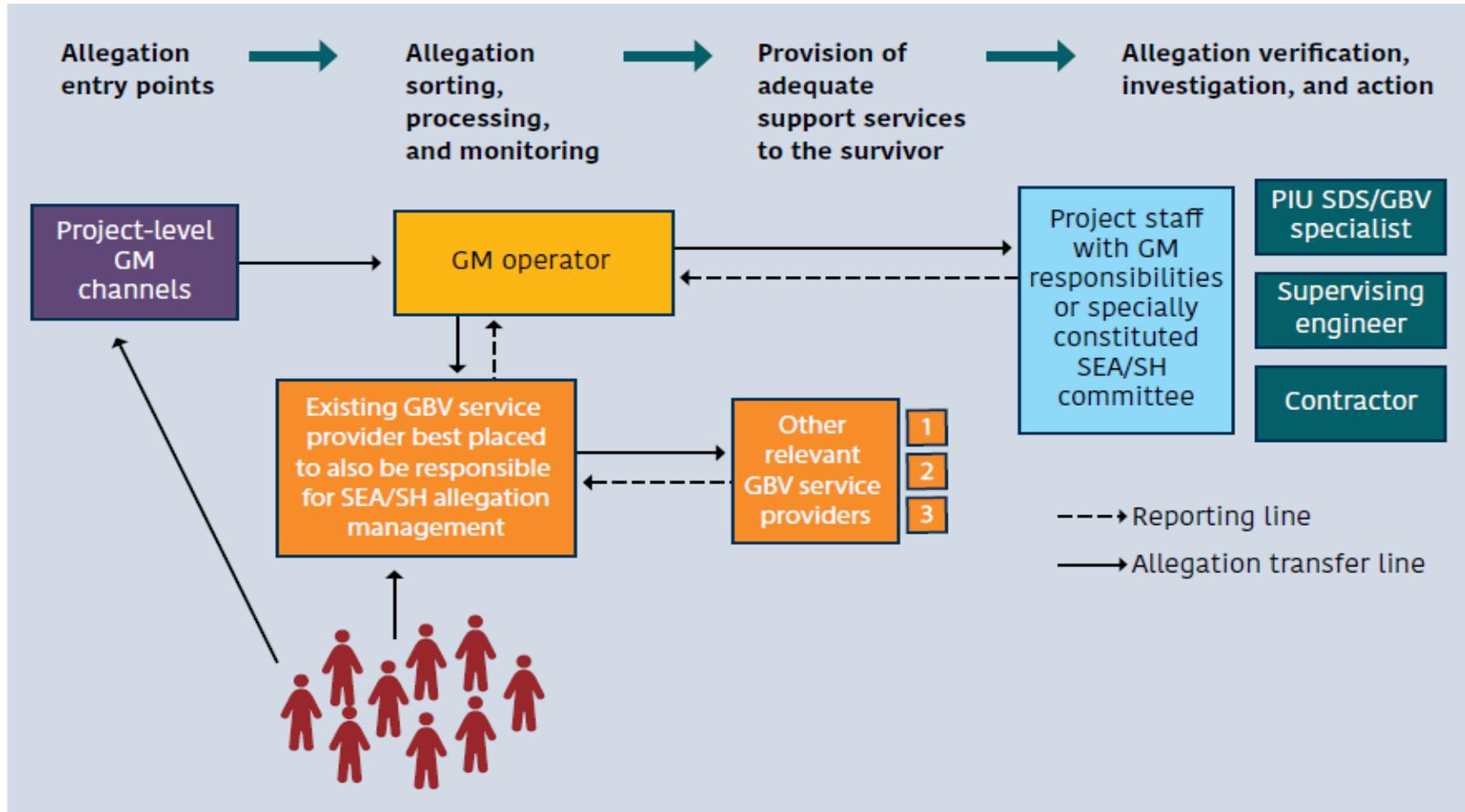
GBV service providers functioning in Bangladesh during COVID-19<sup>17</sup>

|   |  |
|---|--|
| <p>a. <b>Helplines</b></p> <ul style="list-style-type: none"> <li>National Helpline Centre for Violence against Women and Children: <b>10921</b>;</li> <li>Legal Aid Helpline: <b>16430</b></li> <li>Marie Stopes Bangladesh: <b>08000222333</b>;</li> <li>Acid Survivors Foundation (ASF): <b>+8801713010461</b>;</li> <li>Bangladesh Legal Aid and Services Trust (BLAST): <b>+8801715-220 220</b>;</li> <li>Ain o Salish Kendra (ASK): <b>+8801724415677</b>;</li> <li>Rights Jessore: <b>+8801977182023</b>;</li> </ul> | <p>b. <b>Immediate rescue information</b></p> <ul style="list-style-type: none"> <li>OCC (Medical): <b>109</b></li> <li>OCC(Judicial) <ul style="list-style-type: none"> <li>a. Faridpur: +8801711248085;</li> <li>b. Sylhet: +8801716128370;</li> <li>c. Barishal: +8801715635866;</li> <li>d. Rajshahi: +8801718620310;</li> <li>e. Chittagong: +8801819941106;</li> <li>f. Bagerhat: +8801911100177;</li> </ul> </li> </ul>   |
| <p>c. <b>Psycho-social counseling</b></p> <ul style="list-style-type: none"> <li>Marie Stopes Bangladesh: <b>02-58152538</b>;</li> <li>Acid Survivors Foundation (ASF): <b>+8801713010461</b>;</li> <li>Ministry of Women and Children Affairs (focused on COVID-19 Psychosocial Counselling): <ul style="list-style-type: none"> <li>• <b>National:</b><br/> <b>12.00-3.00:</b>+8801715297944,<br/> <b>3:00-6.00:</b> +8801727209070<br/> <b>6.00-9.00:</b>+8801914317856</li> </ul> </li> </ul>                           | <p><b>Regional</b></p> <p><b>9.00-12.00:</b></p> <ul style="list-style-type: none"> <li><b>Dhaka, Dhaka Medical College Hospital (DMCH):</b> +8801780839944,</li> <li><b>Barishal, Sher e Bangla Medical College and Hospital (SBMCH):</b> +8801913566477,</li> <li><b>Chattogram, Chattogram Medical College and Hospital (CMCH):</b> +8801676095159,</li> <li><b>Rangpur, Rangpur Medical College and Hospital (RpMCH):</b> +8801777337089</li> </ul> <p><b>12.00-3.00:</b></p> <ul style="list-style-type: none"> <li><b>Rangpur, Rangpur Medical College and Hospital (RpMCH):</b> +8801919137331,</li> <li><b>Khulna, Khulna Medical College and Hospital (KMCH):</b> +8801723545731</li> </ul> <p><b>3.00-6.00:</b></p> <ul style="list-style-type: none"> <li><b>Rajshahi, Medical College and Hospital (RMCH):</b> +8801515621317,</li> <li><b>Dhaka, Dhaka Medical College and Hospital (DMCH):</b> +8801675620992,</li> <li><b>Cox’s Bazar Medical College and Hospital (CoxMCH):</b> +8801847461880</li> </ul> <p><b>6.00-9.00:</b></p> <ul style="list-style-type: none"> <li><b>Sylhet, Sylhet Osmani Medical College and Hospital (SOMCH):</b> +8801766356094,</li> <li><b>Chattogram, Chattogram Medical College and Hospital (CMCH):</b>+8801761362020,</li> <li><b>Faridpur, Faridpur Medical College and Hospital (FMCH):</b> +8801673719894;</li> <li><b>Aparajita Jessore:</b> +8801761222222-4</li> </ul> |
| <p>d. <b>Shelters</b></p> <ul style="list-style-type: none"> <li>Judicial OCC</li> <li>Faridpur: <b>+8801711248085</b>; Sylhet: <b>+8801716128370</b>; Barishal: <b>+8801715635866</b>; Rajshahi: <b>+8801718620310</b>; Chittagong: <b>+8801819941106</b>; Bagerhat: <b>+8801911100177</b>;</li> <li>Dhaka Ahsania Mission (shelter with transport) (880-2) 58155869, 9127943, 9123402, 9123420;</li> </ul>  | <p>e. <b>Legal Counseling</b></p> <ul style="list-style-type: none"> <li>Bangladesh Legal Aid and Services Trust (BLAST): <b>+8801715-220 220</b>;</li> <li>Ain o Salish Kendra (ASK): <b>+8801714-025069</b>;</li> <li>Organization for Women’s Development in Bangladesh (OWDEB) – Chittagong (Providing service to Ward 4,5,6 now): <b>+8801711 – 171060</b></li> <li>Aparajita Jessore: <b>+8801761222222-4</b></li> </ul>   |

<sup>17</sup>This GBV service providers list is constantly being updated, in context of COVID-19 and sourced from the WB.

Annex III

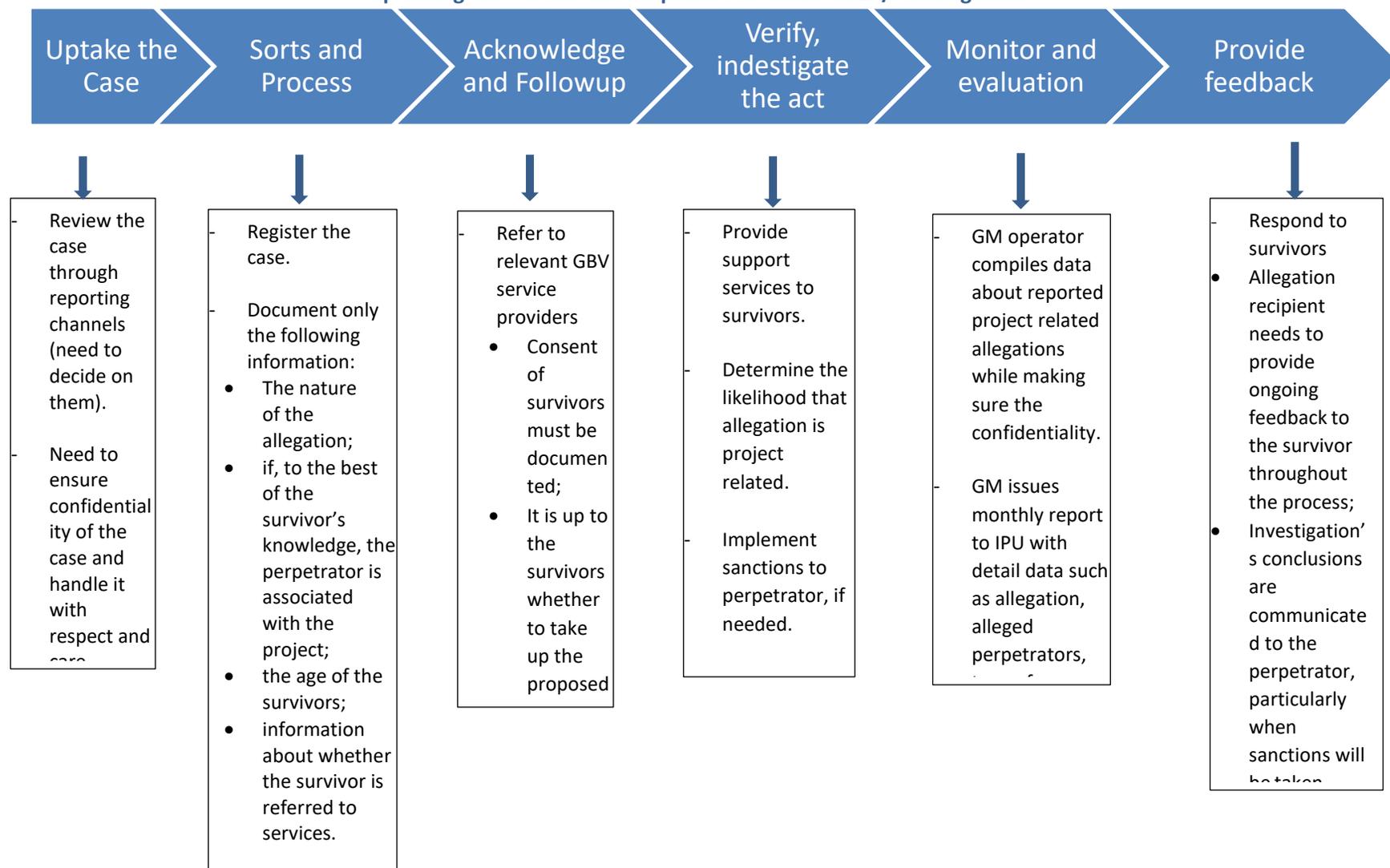
Project Grievance Mechanism to address SEA/SH Allegations<sup>18</sup> (this model will be further tailored to the project needs)



<sup>18</sup> <http://documents1.worldbank.org/curated/en/399881538336159607/pdf/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Gender-based-Violence-English.pdf>

Annex IV

Operating Procedures and Response Protocol for SEA/SH Allegations<sup>19</sup>



<sup>19</sup> Same as 18