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RURAL DEVELOPMENT  
MINADER

**PROJECT MANAGEMENT UNIT EMERGENCY TO FIGHT AGAINST THE FOOD CRISIS  
EMERGENCY PROJECT TO COMBAT THE FOOD CRISIS IN CAMEROON**

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PROJECT MANAGER: MINADER

**MECHANISM FOR THE MANAGEMENT OF  
GENDER BASED VIOLENCE  
COMPLAINTS/GRIEVANCES FOR THE  
EMERGENCY PROJECT TO COMBAT FOOD  
CRISIS IN CAMEROON**

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## ABBREVIATIONS

<b>E&amp;S</b>	Environmental and Social
<b>ESF</b>	Environmental and Social Framework
<b>SEA</b>	Sexual Exploitation and Abuse
<b>CT</b>	Compliance Team
<b>IPFs</b>	Investment Project Financing
<b>SH</b>	Sexual harassment
<b>GRM</b>	Complaints/Grievances Redress
<b>MINAS</b>	Ministry of Social Affairs
<b>MINPROFF</b>	Ministry for the Promotion of Women and the Family
<b>ESS</b>	Environmental and Social Standards
<b>NGO</b>	Non-Governmental Organization
<b>FBOs</b>	Faith Based Organization
<b>CBOs</b>	Community Based Organization
<b>PULCCA</b>	Emergency Project to Combat Food Crisis In Cameroon
<b>PV</b>	Minutes
<b>GBV-GRM</b>	Gender based violence specialist
<b>RAF</b>	Financial and Administrative Manager
<b>SCOM</b>	Communication Specialist
<b>SQE</b>	Specialist in Environmental Issues
<b>SQS</b>	Social Issues Specialist
<b>GBVI</b>	Gender Based Violence Issues
<b>M&amp;E</b>	Monitoring-Evaluation Manager
<b>SMS</b>	Short Message Service
<b>PS</b>	Procurement Specialist
<b>PIU</b>	Project Implementation Unit
<b>GBV</b>	Gender-Based Violence
<b>VAC</b>	Violence Against Children

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## Glossary

In implementing PULCCA, it is important to remember that when it comes to gender based violence complaints redress mechanism, the terminology used can be a source of confusion for many project stakeholders. In some cases, words like problem, concern, complaint, grievance, and claim may be used interchangeably. In other circumstances, these terms may have very different meanings depending on the socio-cultural context of the project area. Therefore, there is no exact answer as to which terms and definitions are most appropriate to use. This document uses the following terms :

Term	Definition
<b>Sexual Exploitation</b>	This is any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
<b>Sexual abuse</b>	Actual or threatened physical intrusion of a sexual nature, whether by force under duress or under unequal conditions
<b>Sexual harassment</b>	Any unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual advances, requests for sexual favors and any other verbal or physical behavior of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts, but it always involves power and gender dynamics in which one person in power uses their position to harass another based on their gender. Sexual behavior is unwanted when the person experiencing it considers it undesirable (e.g., looking someone up and down, kissing or making sexual innuendos by making noises; brushing against someone; whistling and make calls, give personal gifts).
<b>Sexual favors</b>	A form of sexual harassment that includes making promises of favorable treatment (eg, promotion) or threats of unfavorable treatment (eg, loss of employment) based on sexual acts, or other forms of humiliating, degrading or exploitative behaviour.
<b>Survivor</b>	A person who has experienced sexual exploitation and abuse, sexual harassment or other gender-based violence
<b>Confidentiality</b>	An ethical principle according to which service providers must protect the information collected from survivors and only share this information with another provider with their explicit permission. Confidentiality and informed consent should always be prioritized in applying the Guiding Principles and the survivor-centred approach. However, in exceptional circumstances, confidentiality may be broken: 1) if the survivor is an adult who threatens his own life or the life of others and; 2) when the survivor is a child
<b>Privacy Exceptions</b>	
<b>Consent</b>	This refers to approval or assent given voluntarily and freely, after careful consideration. To give consent, individuals must have access to all relevant information at the time they give consent, and they must be able to evaluate

and understand the consequences of any action. They must be aware of and have the power to exercise their right to refuse to engage in action, and they must not feel constrained by financial considerations, force or threats (IASC 2015: 324).

Grievance/Complaint	An expression of dissatisfaction that stems from real or perceived issues, typically referring to a specific source of concern and/or seeking a specific solution. For GBV-GRM, real and perceived impacts are treated equally and given the same due process. The term grievance and complaint are used interchangeably in this document.
GBV Complaints/ Grievance Redress Mechanism	A process for receiving, investigating, and responding to written and verbal concerns or complaints from project stakeholders pertaining to GBV related issues and providing feedback to complaints in a timely and systematic manner.
GBV Grievance Database	System for logging and monitoring all GBV grievances received, including any records of communication/consultation and details of grievance settlement.
Complaint	A complaint is a statement (verbal or written) or expression of displeasure concerning an impact or effect arising from a sub-project as unsatisfactory or unacceptable to the complainant. For the purposes of the SCRP, a complaint is a concern about a minor impact or effect that is short term, low in risk, often temporary, that typically does not require an investigation but does require a specific response to remove or remediate the unsatisfactory or unacceptable impact or effect.
Complainant	An individual, group, or organization that submits a verbal or written GBV related complaint. He/she brings an allegation of SEA to the GRM in accordance with established procedures, whether a SEA/SH survivor or another person who is aware of the wrongdoing.
Concerns	These are general questions, requests for information, or perceptions that do not correlate with a particular impact or incident. If these concerns are not answered to the satisfaction of the sender, they may become complaints. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced. There are instances where consent might not be possible due to age, cognitive impairments and/or physical, sensory, or developmental disabilities. Consent may be withdrawn at any time, and the choice to withdraw consent must be respected.
Requests	GBV related written requests or solicitations addressed to someone with authority to make a decision.

Records of communication / consultation      Records of communication / consultation may include key emails, letters, newsletters, memorandums, complaints, opportunities for improvement, records of distribution/attendance, records of formal and informal meetings and records of commitments.

Environmental and Social Impact Assessment	Process of evaluating and addressing potential social and environmental impacts resulting from PULCCA's Project and identifying any mitigation or corrective measures that will enable the project to meet the requirements of the World Bank Operational Standards and applicable Cameroonian laws and regulations.
Project worker	<ul style="list-style-type: none"> <li>Any person employed directly by the project to carry out tasks that are directly linked to the project (PIU staff, consultants);</li> <li>Persons employed or recruited by third parties to carry out work related to the essential functions of the project, regardless of the location of this work (contract workers);</li> <li>Persons employed or recruited by the main suppliers of the project (employees of the main suppliers)</li> <li>Community members employed or recruited to work on project activities.</li> </ul>
Vulnerable Groups	Individuals or groups within the project area of influence who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to an individual's or group's ethnicity, gender, language, religion, political views, dependence on natural resources, sickness or disability or other factors.
Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between PULCCA and stakeholders (two-way communication) over the life of a project that is designated to promote transparent, accountable, positive, and mutually beneficial working relationships.
<b>Conflict of interest</b>	Any actual or perceived conflict of interest must be avoided in selecting the SEA/SH GRM members. The composition of the SEA/SH GRM may need to change depending on the nature and source of the allegation.
No discrimination	All adults and children, regardless of their gender, must receive care and support under the same conditions. Victims of GBV must receive fair and impartial treatment, regardless of their race, religion, nationality, sexual orientation or gender identity.
Stakeholder	<p>According to Environmental and Social Standard (NES) No. 10 of the new Environmental and Social Framework (ESF) of the World Bank (WB), the term "stakeholder" designates individuals or groups who (i) are or could be affected by the project (parties affected by the project); and who (ii) may have an interest in the project (other parties involved).</p> <p>It is important to note that within the framework of PULCCA they include the beneficiary communities (farmer cooperatives; municipal, traditional and religious authorities) FAO, PAM, MIDENO, SOWEDA, CEDINO, CDPM, NGOs, consultants, service providers, suppliers and all other structures whose activities would be affected by the project,</p>
Child	Refers to a person under the age of 18 and allegations of SEA/SH by or on behalf of a child shall be treated with additional safeguards to protect the child.
	GBV is an umbrella term for any harmful act that is perpetrated against a



Gender-based  
violence (GBV)

person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private.

According to the GBVIMS (Gender-Based Violence Information Management System) classification, there are six (06) main types of GBV below, which were created to enable the collection of data and analysis of statistics on GBV in a systematic manner and are used in relation to GBV, although some may apply to other forms of violence that are not gender-based.

1. **Rape:** Vaginal, anal or oral penetration without consent (even superficial), using the penis or another part of the body. This also applies to inserting an object into the vagina or anus.

2. **Sexual assault:** Any form of sexual contact without consent that does not result in or involve an act of penetration. Among other examples: attempted rape, as well as kissing, caressing and unwanted touching of the genitals or buttocks. Female genital mutilation/cutting (FGM/C) is an act of violence that damages the sexual organs; therefore, they should be classified as sexual assault. This type of incident does not include rape (which consists of an act of penetration).

3. **Physical aggression:** Physical violence that is not of a sexual nature. For example: beatings, slaps, strangulations, cuts, shoves, burns, shots or the use of weapons of any kind, acid attacks or any other act causing pain, discomfort or injury. This type of incident does not include FGM/C.

4. **Forced marriage:** Marriage of a person against their will.

5. **Denial of resources, opportunities or services:** Denial of legitimate access to economic resources/assets or means of subsistence, and to education, health or other social services. There is talk of denial of resources, opportunities and services, for example, when a widow is prevented from receiving an inheritance, when a person's income is forcibly confiscated by their intimate partner or a family member, when a woman is prohibited from using contraception, when a girl is prevented from going to school, etc. Cases of general poverty should not be recorded.

6. **Psychological/emotional abuse:** Inflicts mental or emotional pain or injury. Among others, examples: threats of physical or sexual violence, intimidation, humiliation, forced isolation, pursuit, verbal harassment, unwanted attention, comments, gestures or writings of a sexual and/or threatening nature, destruction of property, etc.

Individual  
associated with  
a World Bank  
project

Such individuals would include any worker hired with World Bank financing, consultants supervising the operation, consultants undertaking technical assistance activities or studies relating to the operation, security personnel hired to protect the project site, PIU staff (whether financed by the Bank or not), contractors or consultants on the project whose contracts are financed by a co-financier, World Bank staff, or anyone to whom the project GBV requirements apply.

## **1.0 PULCCA MANDATE**

The World Bank Environmental and Social Framework require the Borrower to respond to project-related concerns and grievances of project-affected parties through a grievance mechanism. Such a mechanism must be accessible, inclusive, and designed in a manner proportionate to the potential risks and impacts of the project. In this context, a grievance mechanism for allegations of Sexual Exploitation, Abuse, and Harassment (“SEA/SH GRM”) is one element of the World Bank’s approach to addressing SEA/SH in World Bank-financed projects. A SEA/SH GRM may take different forms, based on project context, needs, and level of risk. It may be a project-level GRM that has been adapted to address SEA/SH allegations, it may link the project GRM with an existing grievance mechanism for various types of gender-based violence (“GBV”) including SEA/SH, or it may be a stand-alone SEA/SH GRM outsourced to a third party. The SEA/SH GRM is generally managed by the Project Implementing Unit (“PIU”) and financed by the Project.

A SEA/SH GM operates without prejudice to any other complaint mechanisms or legal recourse to which an individual or community may otherwise have access under national, regional, or international law, or under the rules and regulations of other institutions, agencies or commissions, including the World Bank’s Grievance Redress Service (GRS), or the World Bank’s Inspection Panel.

### **1.1. SUMMARY OF COUNTRY PROGRAM CONTEXT**

This Grievance Redress Mechanism (GRM) is prepared to guide the receipt, management, and resolution of complaints and questions from project affected persons and stakeholders of the Emergency Project to Combat the Food Crisis in Cameroon (PULCCA). PULCCA is a three-year World Bank (WB) funded project that aims to respond urgently to mitigating the short-term impacts of food and nutrition insecurity, as well as its medium-term drivers to build economic, climate and community resilience in the six intervention (Far North, North, Adamawa, North West, South West and East) regions of Cameroon. The Government of the Republic of Cameroon has prepared, with the financial and technical support of the World Bank, the Emergency Project to Combat the Food Crisis in Cameroon (PULCCA).

Indeed, the food insecurity situation in Cameroon is very worrying. The most recent Cadre Harmonisé estimates from October to December 2021 show that 2.43 million Cameroonians face severe and high food insecurity conditions, and almost a quarter of a million face humanitarian emergency conditions. This situation is not expected to improve and projections from June to August indicate 2.3 million people facing acute food insecurity.

The reduced availability and accessibility of food, particularly in regions affected by conflict and therefore less accessible, requires in certain cases the use of humanitarian food aid. Furthermore, the low level of accessibility due to rising food prices and low incomes is likely to increase food insecurity in Cameroon. Currently, commodity prices are rising and increasingly volatile despite government restrictions on grain exports. In addition to high prices, limited livelihood opportunities, compounded by the impacts of COVID-19, are major causes of food insecurity.

To meet these challenges, coupled with vulnerability to climate shock, the Cameroonian government has adopted a coherent set of political and strategic texts which take due account of the agricultural sector. The proposed project: (i) responds to the priorities identified in SND30, the CSAIP and those of the National Pastoral Contingency Plan (PNCP). The PNCP focuses on increasing livestock and fisheries production, and prioritizes the participation of women and youth, particularly in the North West, South West and South West regions. Far North; and (ii) also

constitutes a direct response to the support of several GoC programs and mandates in agriculture and livestock.

PULCCA is organized for this purpose around the following four technical components:

- **Component 1:** “Support for food and nutritional stabilization of the rapid response with a view to rapid recovery and strengthening resilience” which aims to address the immediate needs of food insecurity in the areas targeted by the project.
- **Component 2:** “Enhancing smallholder production capacities through crop and livestock support for climate and nutritional resilience” which aims to improve sustainable production, including post-harvest management, processing and market access for producers.
- **Component 3:** “Support for strengthening government capacities for monitoring food security crises, information systems and agro-meteorological services” through strengthening information systems and preparedness capacity so that Cameroon can minimize humanitarian costs And socio-economic consequences of future food security crises.
- **Component 4:** “Project coordination, management, communication, and monitoring” which will cover the costs of implementing Project activities.

In addition to national regulatory provisions governing development projects in Cameroon, operations and projects financed by the World Bank are subject to the environmental and social requirements contained in the Environmental and Social Framework of this institution. Within the specific framework of PULCCA, the Government of Cameroon has undertaken, through an Environmental and Social Commitment Plan (ESCP) jointly agreed with the World Bank, to implement concrete measures and actions so that the Project is executed in compliance with the Environmental and Social Standards (ESS) of the World Bank.

In response to the World Bank's Gender/GBV, Environmental and Social Management Framework requirement and in accordance with the gender/gbv, social and environmental policy in Cameroon, PULCCA has also established a separate gender-based violence Grievance Redress Mechanism (GBV-GRM) which is hypersensitive category of complaints to properly address SEA/SH risks. The GBV-GRM is placed prior to consultant's mobilization. While many projects have traditionally only considered GRM in the context of resettlement, the World Bank's ESF requires that IPF have a grievance mechanism that will be “proportionate to the potential risks and impacts of the project” (ESS10, para 27). This is meant to apply to all aspects of the project (Violence against Women and Girls (VAWG) is a pervasive global problem. It is a violation of basic human rights and a deterrent - on development) Any parallel GRMs operated by contractors and consultants should include processes to refer complaints to the project GRM so as to ensure that an accurate understanding of the project's complaints is always available.

## **1.2. OBJECTIVE OF THE GBV-GRM**

PULCCA GBV-GRM is intended to:

- Provide avenue for vulnerable groups (IDPs, returnees and refugees) and survivors of sexual exploitation and abuse/ sexual harassment (GBV/SEA/SH) to have a confidential, transparent, ethical, safe handling, of grievance incidents that also includes a referral pathway for gender-based violence services such as psycho-social support, legal and medical.

- Provide a way for community members to consistently engage with the project, enhance relationships, reduce gender/gbv, social and environmental risks, and enable more responsive and responsible management of the project.

For GBV and particularly SEA/SH complaints, there are risks of stigmatization, rejection and reprisals against survivors. This creates and reinforces a culture of silence so survivors may be reticent to approach the project directly. Some survivors will choose to seek services directly and never report to the GRM, which may lead to a discrepancy in the number of cases reported to the Bank by service providers and the GBV-GRM PULCCA focal person. To enable women to safely access the GRM, multiple channels through which complaints can be registered in a safe and confidential manner is enabled. Specific GBV-GRM considerations for addressing SEA/SH are:

- The GBV-GRM is operated by PULCCA which is the project implement unit (PIU)

PULCCA's regions of intervention have high SEA/SH risks. Thus, consideration is given to a separate GBV SEA/SH GRM system, managed by PULCCA GBV-focal points, providing feedback to the World bank GBV team lead parallel to Workers/Enterprise GRMs managed by the PULCCA Social focal point.

A separate note on GRMs for SEA/SH in PULCCA provides additional discussion on the pros and cons of addressing SEA/SH through the overall project GRM system as opposed to an independent parallel GBV-GM. The GBV-GRM focal points at community, sub-division, division and regional levels are trained on how to collect SEA/SH cases confidentially and empathetically (with no judgement). See Annex 2 on collecting information on SEA/SH for further details.

- PULCCA have multiple complaint channels, and these are trusted by those who need to use them. Community consultations may be one mechanism to identify effective channels (e.g. GBV Community focal points (FBOs, CBOs, district hospitals, regional hospitals))

- The GBV-GRM does not ask for, or record, information on more than the following related to the SEA/SH allegation:

- The nature of the complaint (what the complainant says in her/his own words without direct questioning);
- If, to the best of the survivor's knowledge, the perpetrator was associated with the project;
- If possible, the age and sex of the survivor; and
- If possible, information on whether the survivor was referred to services.
- The survivor will be informed about his or her right to place limitations on the type of information they want shared.
- The grievance recipient will explain to the survivor his or her right to control whether and how information about the case is shared with other entities as well as any implications of sharing information.
- At all times, the GRM Focal Point will provide feedback promptly to the aggrieved
- party (unless the case was filed anonymously).

- The GBV-GRM assist SEA/SH survivors by referring them to GBV service provider(s) for support immediately after receiving a complaint directly from a survivor.

- The information in the GBV-GRM must be confidential especially when related to the identity of the complainant and should primarily serve to: (i) refer complainants to the GBV service provider; and (ii) record resolution of the complaint.

These complaints, due to their highly sensitive nature (classified “serious incidents”), their treatment follows a specific approach based on the six guiding principles of the holistic approach centered on the needs and choices of survivors, namely:

1. Ensure the availability of a minimum package of quality services accessible to survivors;
2. Restore the dignity of survivors;
3. Ensure the physical and psychological safety of survivors at all times;
4. Guarantee confidentiality to survivors by not disclosing any information concerning them without their informed consent;
5. Ensure that all actions to be taken are guided by respect for survivors;
6. Ensure non-discrimination is respected so that survivors benefit from fair and equal treatment with others.

To implement these guiding principles, a **referencing system** will be put in place after the risk mapping exercise. It is made up of the different actors exercising their respective roles and the reporting mechanism activated in the different structures providing GBV/SEA/SH/VAC services. Thus, the survivor support system is composed of the following levels:

- ❖ GBV Community Focal Points
- ❖ Sub-divisional Focal Point
- ❖ Divisional Focal Point
- ❖ Regional Focal Point
- ❖ PULCCA
- ❖ The World Bank

## **2.0 PRINCIPLES GUIDING PULCCA SEA/SH GRM**

**1. Accessibility, transparency, and non-discrimination:** A SEA/SH GRM must be accessible to all potential complainants and its existence and operation should be transparent to the community in which it is situated. SEA/SH GRM accessibility should be sensitive to gender, age, disability, and other potential contextual barriers. Adequate information about the existence and operation of the SEA/SH GRM must be provided in a language and manner accessible to any potential project-affected person. The principle of non-discrimination should be respected when receiving, processing, and referring the allegation.

**2. Survivor-centered approach:** All prevention and response actions must balance the respect for due process with the requirements of a survivor-centered approach under which the survivor’s safety, confidentiality, choices, needs, and well-being remain central. These steps serve to minimize the potential for re-traumatization and further violence against the survivor.

Survivor – center approach also means that survivor has the freedom and right to report an incident to anyone: community member, project staff, GBV case manager, local authorities. All recipients of the report should – with the survivor’s informed consent – report the case to one of the PULCCA’s formal grievance recipients. Furthermore, a survivor can ask someone else to act as a survivor advocate and report on her/his behalf.

**3. Safety:** The survivor’s physical and psychological safety as well as that of their family remains a priority at all times. Above all, cases of GBV/SEA/SH, the assessment of the security situation of survivors (the risk assessment) must be continuous and may involve physical protection if

necessary in order to avoid possible acts of retaliation; the informed consent of the survivor is always prior. PULCCAs' protection services, including GBV case management services, are best placed to provide this kind of support. GRM's actions and responses will always be guided by respect for the choices, needs, rights and dignity of the survivor.

**4. Confidentiality:** All grievance recipients and anyone handling the GBV/SEA/SH related grievances must maintain absolute confidentiality in regards to the case. Confidentiality should cover all information in a complaint that may lead to the identification of a specific incident or those affected by the allegation. This applies to the survivor and witnesses. Confidentiality is a key to protecting survivor's and witnesses' safety. Confidentiality requires that information gathered about the allegation should not be shared with persons or entities unless there is explicit permission granted by the complainant. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. Even in such cases, information-sharing should take place on a strict need-to-know basis, limited to essential information, and based on pre-established information sharing protocols which are in line with best practices for the handling of SEA/SH cases. But then, there are *exceptions* to confidentiality under distinct circumstances for example:

- a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others, in which case referrals to lifesaving services should be sought;
- b) if the survivor is a child and there are concerns for the child's health and safety. The survivors need to be informed about these exceptions.

Reports of grievances to the Bank and PULCCA shall only include an anonymized summary of allegations based on pre-established information sharing protocols.

If the alleged perpetrator is an employee of the contractor, consultant or a staff of PULCCA, to protect the safety of the survivor, and the workplace in general, PULCCA, contractor or consultant should assess the risk of ongoing abuse to the survivor and in the workplace. This should be done in consultation with the survivor and with the support of the GBV service provider. Reasonable adjustments should be made to the alleged perpetrator's or survivor's work schedule and work environment—preferably by moving the perpetrator rather than the survivor—as deemed necessary. PULCCA should provide adequate leave to survivors seeking services after experiencing violence.

**5. Considerations regarding children and persons with intellectual disabilities:** When the survivor is a child, the best interests of the child is the governing principle. Children are considered incapable of providing consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. In the case of children, informed consent is normally requested from a parent or legal guardian and the children.

The World Bank considers that a child is anyone under the age of 18 and, as such, not able to give free and voluntary consent. Similar additional considerations and protective safeguards may also apply where the complainant or survivor is a person with intellectual disabilities.

**6. Rights-based approach:** Analyzes and addresses the root causes of discrimination and inequalities to guarantee the right of everyone to live free, in dignity and free from violence, exploitation and abuse, in accordance with the principles of human rights. It promotes among

people the ability to know and claim their rights. This includes giving them more opportunities to participate in decision-making processes that concern them.

**7. Informed Consent:** The survivor can only give approval to the processing of a case when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up (see Annex 8 for informed consent process).

Asking for Consent means asking the permission of the survivor to share information about him/her with others and/or to undertake any action (for instance investigation of the case).

Where possible, the consent form can be used (in cases of direct person-to-person reporting). By signing this form survivor can formally agree (or disagree) with the further processing of the case. The form will clearly state how information will be used, stored and disseminated. If a survivor does not consent to sharing information, then only non-identifying information can be released or reported on.

**7. Community approach:** Ensures that the community is actively involved as partners and drivers of change. She also actively participates (direct consultations with women, girls and other groups at risk) in the identification and development of strategies to better prevent and respond to GBV/EAS/SH.

**8. Implementation context and relevance:** Consult specifically with women and girls (in separate, small groups led by a woman) to confirm the accessibility and security of entry points and procedures for handling complaints related to EAS/HS

**9. Participation:** Localize the GBV-GRM so that it is adapted to the local context, complies with local governance structures and fits within the specific framework PULCCA

**8. Humanitarian principles:** Implies that humanity, impartiality, independence and neutrality must be taken into account in the implementation of the minimum standards. They must ensure that affected populations have access to an effective humanitarian response.

**9. The “Do no harm” approach:** consists of taking all necessary measures to prevent the work of PULCCA from exposing beneficiary communities to other harm.

**10. Respect:** All actions taken will be guided by respect for the wishes, rights and dignity of the survivor.

- If possible, conduct interviews in a private environment and with translators of the same gender as the survivor.
- Always try to conduct interviews and examinations with staff of the same gender as the survivor.
- Know how to actively listen.
- Maintain an attitude that avoids judgement.
- Be patient, and do not press for more information if the survivor is not ready to talk about what he/she experienced.
- Only ask survivors relevant questions.
- The survivor's virginity status is not in question and should not be discussed.

- Avoid asking the survivor to repeat their story over multiple interviews.
- Refrain from any sign of derision or disrespect towards the survivor or their culture, family or situation.
- The survivor should be referred to appropriate/relevant actors when there is no one qualified to conduct an interview.
- Ask the survivor aside if they would like their partner (married or not) to be present during the interview.
- If the survivor is a child, the principle of the best interests of the child must govern decisions about the type of care and support that will be provided.

### **3. 0. COMPOSITION OF THE PULCCA SEA/SH GRM**

PULCCA SEA/SH GRM is composed of:

- i) the GBV-GRM focal points;
  - ii) the GBV service provider,
  - iii) GBV Specialist at PULCCA
  - iv) the Coordinator of PULCCA and
  - v) The World Bank, each with qualifications and experience satisfactory to the World Bank
- All SEA/SH GRM staff shall have received training on GBV and SEA/SH, and on how to conduct basic fact analysis regarding whether: (i) the allegation in question is one of SEA/SH; and (ii) the alleged perpetrator is associated with a World Bank-financed project or not. The SEA/SH GRM staff shall have relevant knowledge and expertise to: (i) enable them to differentiate SEA from SH; and SEA/SH from other forms of GBV; (ii) address allegations where the survivor is a child; (iii) uphold the guiding principles and ethical requirements for dealing with survivors of SEA/SH; and (iv) communicate in the relevant local language(s). The GBV-GRM PULCCA Specialist shall have adequate knowledge of GBV services available, how to access said services, who to contact, any financial support that may be provided, and available options for assistance within and outside of the SEA/SH GRM.

### **4.0. BROADCASTING OF PULCCA GBV-GRM**

The success of the GBV-GRM depends largely on stakeholder awareness of it. As such, information relating to the processes and procedures of this GBV-GRM will be widely shared with the communities in the project intervention areas. PULCCA will use the following channels to allow all stakeholders and at all levels appropriate the GRM:

- At the regional levels, brochures and leaflets and explanatory messages will be used as communication support after sensitization/education workshops.

At the village, sub-divisional and divisional levels, brochures and leaflets and explanatory messages will be used as communication support after sensitization/education workshop.

Explanation and awareness campaigns in national languages will be done (by the national and local radios in the intervention regions). Concretely, this will involve sharing with all stakeholders within the scope of the project and beyond on the approach, the instances and methods of referral, the rules, the procedures for managing complaint. It is in this logic that the appropriation of the



GBV-GRM will be ensured by the stakeholders. It is in light of these principles of accessibility that the method of filing complaints will be diversified.

## **5.0 HANDLING SEA/SH COMPLAINTS**

Every claim or complaint, whether founded or not, must go through the resolution process. The complaint, whether real or the result of a misinterpretation, must be registered according to the complaint management procedure in place and based on the fundamental principles.

Members of the committee will clearly assess the nature of the complaint, the appropriate sanction to be applied to the perpetrator, confirmation that the survivor has received support, and that sanctions have been enacted. Local community focal points should note that existing modalities for reporting complaints may not be appropriate to enable reporting or to handle the sensitivities associated with SEA/SH. Thus, alternate channels for reporting, such as a direct call to PULCCA GBV specialist or to a referral who will contact the GBV specialist directly.

Complaints can be issued in all local languages of the project intervention areas, as well as in the official languages of the country (French and English). Several approaches are used in filing claims: Telephone call (Toll free), verbal, whatsapp, mails in suggestion boxes/direct to any of the GRM personnel and or by serial messaging service (sms)

The costs of operating the GBV-GRM are financed by the project as part of the general project management costs. The GBV-GRM have in place processes to immediately notify both PULCCA and the World Bank of any SEA/SH complaints, with the consent of the survivor.

In receiving basic information regarding a GBV/SEA/SH/VAC incident, the PIU must immediately (within the same 24 hours after receipt) contact the project focal points at the World Bank level with the informed consent of the survivor or the complainant. Information on GBV/SEA/SH/VAC, the gender/age of the survivor and whether the complaint is believed to be related to the project or not. Sharing the report on the handling of hypersensitive complaints will be limited to the GBV Specialist PULCCA, M&E specialist, the Coordinator, and the World Bank. For cases related to GBV/SEA/SH/VAC, no amicable settlement is acceptable.

Everyone involved in the resolution process should be specifically trained to address and resolve SEA/SH-related complaints and a dedicated focal point from the GBV service provider will be part of the resolution process. Moreso, at all levels, the reception of SEA/SH complaints will be done only by the female focal points except otherwise justified.

## **6.0 ROLES AND RESPONSIBILITIES OF ACTORS IN THE SEA/SH GRM**

1. The GRM focal points are responsible for: (i) receiving, sorting, and logging allegations; (ii) referring all survivors who come to the GRM to relevant GBV service providers; and (iii) notifying the PULCCA and then the World Bank of the allegation in line with pre-established information-sharing protocols.

2. The SEA/SH Committee is responsible for determining whether the allegation: (i) falls within the definition of SEA/SH; and (ii) whether the alleged perpetrator is associated with the Project or not. Where the SEA/SH Committee determines that: (i) the allegation amounts to SEA/SH and (ii) the alleged perpetrator is associated with the Project, with the survivor's consent, it shall refer the allegation to the employer (and the authorities if required as required by the Cameroon law).

## **7.0 SPECIFIC STEPS OF THE SEA/SH GRM**

The mechanism will allow victims of GBV/SEA/SH to lodge their complaints securely and confidentially. The guidelines for managing GBV/SEA/SH complaints are as follows:

To respond to potential incidents of GBV/SEA/SH, a referral system based on a help service map will be developed and inserted into process soonest. In the event of an incident, victims will be referred to the appropriate support services. A list of GBV/SEA/SH service providers will be made available by the project, including GBV/SEA/SH focal points associated with the GRM.

Any GBV/SEA/SH incident will be reported to the GRM, following the appropriate methods and preserving the confidentiality of information relating to the victim. Specifically, the GRM will only record the following information relating to the complaint: (i) The nature of the complaint (what the complainant says in their own words without direct questioning); ii) If, to their knowledge, the perpetrator of the violence was associated with the project; and, iii) If possible, the age and sex of the victim.

The GRM will also immediately notify the Coordinator of PULCCA and the World Bank of any complaints of GBV/SEA/SH. The Bank will be informed by the project of any GBV/VAC incident within 24 hours of becoming aware of it. All cases of GBV/SEA/SH brought to the attention of the complaints mechanism will be documented, but will remain confidential in order to preserve the confidentiality of the victim.

## **8.0. THE REFERENCING CHANNELS OF INCIDENTS**

Case referrals can happen in several directions among several actors:

- i. Referral of non-specialists to specialized services for additional care.
- ii. Referencing among GBV specialist providers. For example, a survivor may seek help directly from a health provider or psychosocial worker; Depending on the needs presented, care should be provided together with comprehensive information regarding other services available, including the associated benefits and consequences. At this time, the survivor may be referred to other specialized services according to their choice and needs.
- iii. Referencing GBV specialist providers to non-specialist providers. While the survivor is receiving care from specialists, he/she may wish to access other services that are not directly related to GBV services; in this case, the survivor will be referred to the relevant actors (and the case manager will follow up if appropriate).

### **8.1. Preparatory actions for receiving survivors**

All relevant actors in a PULCCA intervention area (e.g. complaints management committees, community leaders or authorities, construction site supervisors, etc.) should receive basic information and be prepared for reception and for the referral of GBV cases:

- In order to ensure safety, confidentiality and survivor-centered response to GBV/SEA/SH complaint, all relevant staff of the PIU, will receive training on receiving management of GBV, SEA/SH complaints and referral systems.
- Appoint one or two focal points depending on the structure in question (preferably female, or one male focal point and one female focal point) who are trained on how to receive and refer GBV cases while following the guiding principles;
- Ensure that community members know these focal points and how to contact them;

- Train these relevant actors on the guiding principles of care and the standard operating procedures that are relevant to them; And
- Regularly update information on available services and service maps for the different areas of intervention.
- The contractors will be trained in key protocols, including referral, reporting and informed consent protocols, in order to receive these cases appropriately and forward them immediately to the GBV/SEA/SH referral system.

## **8. 2. What to do when services are not available**

When services are not available or not complete in an intervention area, a survivor should still have access to information to ensure their safety and basic emotional support. It is important to manage survivors' expectations regarding the services they may or may not access. Therefore, it is important to stay informed of the services available in a certain intervention area.

## **8.3. Reporting and referencing: Non-specialists in GBV**

When an agency or lay person receives a GBV case, that actor's main priorities are to provide basic emotional support as well as information about services available in the area and how to access them. These actors should have access to this information through operational focal points in the referral circuit. Immediate actions that these actors can take are as follows:

- Listen ;
- Provide basic information on the services available;
- Request informed consent to refer the case;
- Refer to other services in a timely manner (support ends here).

When non-specialist actors refer a case to a specialist GBV provider:

- Responsibility for the case is transferred to the new provider;
- The actor doing the referencing must ensure that the other actor can provide the requested services;
- The specialist provider should confirm receipt of the case; if the provider cannot help the survivor, he/she should notify the referring actor;
- Specialist providers cannot share information other than details about their ability to provide services to the survivor.

*Exceptions to confidentiality:* Confidentiality and informed consent should always be prioritized by applying the guiding principles and survivor-centered approach. However, in exceptional circumstances, confidentiality could be broken: 1) if the survivor is an adult who threatens their own life or the lives of others, and 2) when the survivor is a child.

## **8. 4. Reporting and referencing: GBV specialists**

For some survivors, they will want to access support services, and for some others, not necessarily. For survivors who need assistance, specialized services, such as social support, psychological first aid, and medical interventions are beneficial. All service providers share the same roles and responsibilities in treating GBV survivors. The main services that include holistic care are as follows:

- Case management;

- Medical care ;
- Psychosocial and mental health support;
- Security options ;
- Legal and judicial assistance.

The GBV specialists will ensure that reports do not contain any information with the potential of identifying survivors (including names of survivors, families and perpetrators).

Furthermore, they will provide ongoing feedback to the survivor throughout the process. After conclusion of any investigation, the survivor must be informed first to determine whether the perpetrator can be informed and proposed sanctions against the perpetrator can be taken.

## **9.0 COMPLAINTS HANDLING PROCEDURES**

### **9.1. Uptake, Sort, And Process**

(i) Upon receipt, the GRM focal points sorts and processes the allegation. Allegations can be received by the SEA/SH GRM through various means (e.g., online, phone, writing, or in-person), submitted by multiple types of complainants (e.g., survivor, witness, or whistleblower), and received through multiple channels (e.g., the PULCCA focal point, Focal points or GBV service provider). When the allegation is received in person, the GRM focal points records the survivor's account of the incident; this shall be conducted in a private setting, ensuring that any specific vulnerabilities such as putting the survivor into more risk are taken into consideration.

(ii) The SEA/SH GRM should not ask for, or record, information other than the following: (i) the nature of the complaint; (ii) if possible, the age and sex of the survivor; and (iii) if, to the best of the complainant's knowledge, the perpetrator is associated with the Project or not; and (iv) if possible, information on whether the survivor was referred to services. It is important to seek the survivor's consent during intake and referral to services by clarifying in advance the remit of the GRM, what referral services entails, key elements that need to be collected, and informing of mandatory reporting laws as relevant. Standardized incident intake and consent forms will be used. The GRM Focal points shall record all allegations and information received respecting the principle of confidentiality.

(iii) The GRM focal points shall receive all allegations but shall, where the complainant is not the survivor, encourage the complainant to reach out to the survivor and explain the potential benefit of coming forward alone or with the person reporting to the GRM. In the event that there is a credible concern about the safety of the survivor, the GRM focal point may attempt to approach the survivor directly to offer a referral to services. Here, as elsewhere, the survivor's consent governs.

### **9. 2. Acknowledge and Follow Up**

(i) With the survivor's consent, the GRM focal points shall, within the shortest timeframe possible (24 hours), refer the survivor to the relevant GBV service provider for any specific service the survivor may need and want in accordance with pre-established roles and confidential referral procedures. These services may include legal, psychosocial, medical care, safety and security-related support, and maybe economic empowerment opportunities.

(ii) The GRM focal points shall, within 24 hours of receiving the allegation, inform the PULCCA focal point of the SEA/SH incident, by sending an anonymized summary of allegation based on pre-established information sharing protocols. The GRM focal point shall ensure that the information collected regarding the complainant and allegations respects the principles of confidentiality, anonymity, and consent. Elements to be reported should only include: (i) the age and sex of survivor; (ii) the type of alleged incident (as reported); (iii) whether the alleged

perpetrator is employed by the project or not; and (iv) whether the survivor was referred to a service provider. The tracking of all complaints will be done through centralized logging and tracking system (GEMS) that will be put in place after WB training on GEMS application. **The status report will be generated everyweek at the field level, every month at PULCCA level and report to WB quarterly**

### **9.3. Fact Analysis**

If the survivor wishes to pursue disciplinary action in addition to the referral to services provided, the GRM focal point shall refer the case to the SEA/SH Committee to analyze the facts of the allegation by determining whether: (i) the allegation falls within the definition of SEA/SH; and (ii) the alleged perpetrator is an individual associated with a World Bank-financed project or not. If the SEA/SH Committee confirms these two elements, it shall refer the allegation to PULCCA, who shall then be responsible for investigating the allegations. As required by the Cameroon law, the SEA/SH Committee may be obliged to refer the complaint to the local authorities for further investigation and eventual criminal prosecution. The survivor should be made aware of legal obligations of reporting certain incidents before disclosing the complaint, again consistent with the principle of consent. In all cases when there is no mandatory reporting, referral to local authorities should be done exclusively with the survivor's consent.

### **9.4. Grievance verification and investigation**

SEA/SH incident will be verified to determine if it is related to the PULCCA project. The PIU Gender/GBV specialist will form a SEA/SH verification committee comprising PIU (Gender/GBV Specialist project coordinator, the Procurement officer and the social security specialist), WB (TTL and the gender specialist) a member of a local service provider and a representative of the contractor (if relevant). The PIU Gender Specialist will notify the SEA/SH Committee of the incident within 24 hours of incident. The SEA/SH verification committee will consider the SEA/SH allegation to determine the likelihood that the grievance is related to the project (Annex 11: SEA/SH Complaint Verification Form). If after the committee review, SEA/SH allegation confirmed and it is determined that it is linked to a project actor;

- (a) people employed or engaged directly by the PULCCA (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers);
- (b) people employed or engaged through third parties (Project staff, subcontractors, brokers, agents or intermediaries) to perform work related to core functions of the project, regardless of location (contracted workers);
- (c) people employed or engaged by the PULCCA's primary suppliers (primary supply workers); and
- (d) people employed or engaged in providing community labor such as voluntary services or participation in project activities and processes (community workers).

The verification committee discusses appropriate actions to be recommended to the appropriate party—i.e., the employer of the perpetrator, which could be the PIU or a contractor. The PIU will ask contractors to take appropriate action. The committee reports the incident to the perpetrator's employers to implement the remedy/disciplinary action in accordance with Cameroon labour legislation, taking into considerations the cultural norms of the survivor, contract of the perpetrator, and their codes of conduct as per the standard procurement documents. For SEA/SH incidents where the survivor did not consent to an investigation, the appropriate steps should be taken to ensure the survivor is referred to/made aware of available services and that the project

mitigation measures are reviewed to determine if they remain adequate and appropriate or if they require strengthening. If the survivor is interested in seeking redress and wishes to submit an official complaint with the employer, or with entities in PULCCA system, the PIU Gender Specialist/GBV will provide linkages to the relevant institutions through the WB. Ensuring due legal process is up to the police and the courts, not the SEA/SH verification committee. Unlike other types of issues, the PIU Gender/GBV Specialist will not conduct investigations, make any announcements, or judge the veracity of an allegation.

The privacy and security of all parties involved in the verification process will be ensured and protected through the commitment reflected in PULCCA's policies on SEA/SH, codes of conduct, trained, safe (using the "Do No Harm Approach") and staff/committee members committed to confidentiality, discrete SEA/SH incident reporting mechanisms, its accountability and response framework.

## SUMMARY OF GBV PROCESSING

STEPS	PROCESSING TIME
Uptake, Sort, And Process	continous
Acknowledge and Follow Up	24hrs
Fact Analysis	30 days
Grievance verification and investigation	3months
Monitor and Reporting on GBV-GRM Performance	continous

### 9.5. Monitor and Reporting on GBV-GRM Performance

The GRM focal points shall compile relevant data about SEA/SH allegations in accordance with the principles of safety and confidentiality. Data will be stored in secure, lockable spaces with access limited to those authorized to access case data. Cases will be assigned a code based on an agreed standard coding format, and the code will be used to refer to the case verbally or on paper, in place of any identifiable information such as name. survivors' names do NOT appear on admission or referral forms. survivor names may appear on consent forms, but these must be kept separate from admission and referral forms.

The GRM focal points shall issue regular reports to the PULCCA and the World Bank, containing basic information on the types of SEA/SH allegations, the number of the allegations related to a World Bank-financed project, and the age and sex of the survivor to enable them to track grievances. The objective of monitoring of the GRM is to provide survivors with feedback and progress on GRM implementation and to identify challenges and success to inform relevant adaptations on project implementation. It is also to provide accurate recording and reporting to the World Bank on GBV grievance performance including but not limited to number and status of grievances received.

**Three activities are envisaged:** Regular monitoring, reporting, and periodic auditing of the GRM process.

**GRM monitoring:** Monitoring will focus on establishing progress on GRM implementation, documenting feedback from affected persons, and providing implementation support when needed. The monitoring exercise will be led by the Gender/GBV Specialist with support from Focal Persons at the regional and community levels. The monitoring exercise will be guided by the following matrix.

**Table1: Monitoring matrix**

Period	Objective	Suggested Indicators
Quarterly	<p>Assess whether grievances are correctly screened and classified.</p> <p>Ensure grievances are being addressed.</p>	<p>-Total number of grievances received by levels and type.</p> <p>-Total number of grievances received</p> <p>-Timeframe for closure of grievances; by level and type.</p> <p>-Total number of grievances resolved within the acceptable timeframe.</p>
Annual Review of grievance Resolution process	<p>-Assess the project compliance with the GBV-GRM.</p> <p>-Evaluate progress in documenting and resolving complaints.</p> <p>-Identify improvements and update grievance handling and resolution procedures</p>	<p>-Compliance with the grievance mechanism.</p> <p>-Total number of grievances received by level and type. Total number of grievances resolved.</p>

**9. 6. GRM Auditing:** As part of efforts to improve learning and performance of the GRM, the project will institutionalize annual reviews of the GRM. Responsible persons will be trained on the EAS/HS response, including the survivor-centered approach, informed consent, available services and the referral system. PULCCA Gender/GBV Specialist will review and establish the appropriateness of the grievance resolution processes, complaints received, resolution actions taken and implemented, and the level of complainant satisfaction. The review is expected to draw lessons to inform proper management of the GRM. This task will be carried out in parallel with other evaluation activities under the project.

### **9. 7. Provide Feedback**

If the survivor wishes to pursue disciplinary action, the GRM focal points shall provide feedback to the survivor on the receipt and reporting of the allegation. The GRM focal points shall also inform the survivor when the matter has been referred to the PULCCA/World Bank for disciplinary action. Survivors may also prefer to go directly to the PULCCA focal point themselves or through their legal representative after having consulted with referral services.

### **9. 8. Closure of Process**

(i) If the survivor does not wish that disciplinary action be pursued by the PULCCA/world bank, and has not pursued legal action independently, the process is closed after the referral to services has been provided. (ii) In cases where the survivor seeks disciplinary action to be pursued by the employer or where the survivor pursues independent legal action, the process is closed in the

SEA/SH GRM once that disciplinary or legal action has been initiated. The GRM's tracking records should show the results of the referral and the chosen follow-up action (i.e., employment sanction or judicial verdict). Should the survivor seek further assistance from the SEA/SH GRM, the survivor may return to the GRM. (iii) All SEA/SH survivors who come forward before the project's closing date should be referred immediately to the GBV service provider for health, psychosocial and legal support. If the project is likely to close with SEA/SH cases still open, appropriate arrangements should be made with the GBV service provider, prior to closing the project, to ensure there are adequate resources to support the survivor for an appropriate time after the project has closed. Since funding cannot be provided by the project after the closing date, other funding arrangements shall be made (Borrower, other projects within the portfolio that may have aligned objectives and budget flexibility, extension of the closing date)

Regarding SEA/SH cases, the complainant must be informed by the GBV service provider of the outcome of the verification once it has been concluded. Before that, the GBV service provider takes the time to put in place a safety plan for the complainant, if this proves necessary. The perpetrator is also notified by the appropriate representative within his/her structure, only after the complainant has been informed. The GBV service provider continues to play a supporting role with the survivor while respecting the choices and wishes of the latter.

### **Data Sharing**

The GBV service provider should have its own case management process to gather the necessary detailed data to support the complainant and facilitate resolution of the case referred by the GBV-GRM focal point. The GBV service provider should enter into an information-sharing protocol with the GBV-GRM focal point to close the case. This information does not go beyond the resolution of the incident, the date the incident was resolved, and the closing of the case. Service providers are under no obligation to provide case data to anyone without the survivor's consent. If the survivor consents to case data being shared, the service provider can share information when and if doing so is safe, meaning the sharing of data will not put the survivor or service provider at risk for experiencing more violence.

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## **9.9. GBV-GRM Stakeholders Responsibilities**

**Table 2: Stakeholder responsibility in the GRM**

<b>STRUCTURE</b>	<b>DESIGNATED STAFF</b>	<b>ROLE</b>
PULCCA	Coordinator	<ul style="list-style-type: none"> <li>✓ Coordinates the overall implementation of mitigation and response measures to reduce SEA/SH risks</li> <li>✓ Ensures implementation of the sanctions indicated in the codes of conduct.</li> </ul>
	<ul style="list-style-type: none"> <li>○ Gender/GBV Specialist assisted by the Social Specialist and Monitoring, Communication Specialist and Evaluation Officer</li> </ul>	<ul style="list-style-type: none"> <li>✓ Oversee the overall implementation of mitigation and response measures to reduce SEAS/H risks</li> <li>✓ Ensure the implementation of agreements with the service providers that will be indicated in the refering system</li> <li>✓ Ensure that the SEA/SH clause is included in the contracts of workers, partners and service providers, etc.</li> <li>✓ Train institutional partners on GBV-GRM</li> </ul>

		<ul style="list-style-type: none"> <li>✓ Supervise the training of focal points and project workers and partners in GBV/SEA/SH prevention measures;</li> <li>✓ Report GBV incidents to the World Bank within 24 hours;</li> <li>✓ Complete the incident report in collaboration with the World Bank expert;</li> <li>✓ Liaise with compliance teams for the resolution of SEA/SH incidents related to the project;</li> <li>✓ Carry out regular monitoring of activities to assess compliance with SEA/SH requirements, and inform relevant partners for necessary adjustments where necessary;</li> <li>✓ Provide technical support on GBV issues and activities;</li> <li>✓ Define intervention strategies for GBV/SEA/SH prevention and response;</li> <li>✓ Ensure compliance with GBV/SEA/SH prevention and response guidelines;</li> <li>✓ Popularize service mapping with partners and other stakeholders to know the services available in the sites where project activities are implemented;</li> <li>✓ Inform PIU staff and stakeholders about the support structures in the event of an SEA/SH incident, in direct connection with the PIU;</li> <li>✓ Ensures the SQS, SCOM and M&amp;E , to support Victims/survivors with respect, confidentiality, security, and without judgment of people who report GBV incidents.</li> </ul>
Intervention partners	Community, subdivisional, divisional and regional GBV committee	<ul style="list-style-type: none"> <li>✓ GBV focal points must be trained to provide psychosocial first aid to survivors. They are responsible for:</li> <li>✓ Receive and transmit complaints according to the existing internal mechanism;</li> <li>✓ Ensure that victims have benefit from assistance according to their consent, support from aid structures</li> <li>✓ Respect GBV principle confidentiality of the SEA/SH data in their possession;</li> <li>✓ Immediately transmit to the GBV/SEA/SH the PULCCA GBV focal point the allegations of GBV recorded at their level, for their transmission to the World Bank within 24 hours;</li> <li>✓ Ensure the application of GBV/EAS/HS mitigation measures</li> <li>✓ Facilitate the training of project beneficiaries in SEA/SH requirements and procedures;</li> <li>✓ Produce a quarterly report to the PIU containing data compiled on SEA/SH allegations, and presenting progress in resolution;</li> </ul>

		<ul style="list-style-type: none"> <li>✓ Contribute to raising awareness among staff and members of the community;</li> <li>✓ Ensure the training of newly recruited staff on GBV/SEA/SH;</li> <li>✓ Ensure and strengthen confidentiality in the communication of GBV/EAS/SH allegations;</li> <li>✓ Register all SEA/SH complaints and process cases with a view to their transfer to dedicated services for resolution;</li> </ul>
Contractors	Managers	<p>It is the manager of the teams on the construction sites or in the field with the support of the company who ensures this role of:</p> <ul style="list-style-type: none"> <li>✓ Organize awareness activities</li> <li>✓ Implement SEA/SH risk mitigation measures defined by PULCCA;</li> <li>✓ Facilitate workers sign codes of conduct;</li> <li>✓ Report incidents of GBV/SEA/SH immediately to the Gender/GBV specialist and submit to the GBV-GRM</li> <li>✓ Assuring the ethics that govern incident management; impartiality in the handling of SEA/SH incidents involving workers, including in the application of sanctions.</li> <li>✓ Cooperate with GBV/SEA/SH prevention service providers to provide survivors with quality care.</li> <li>✓ Ensure the implementation of the sanctions indicated in the codes of conduct.</li> </ul>
Compliance team	PULCCA Gender/GBV specialist is responsible for verifying/investigating GBV complaints.	<ul style="list-style-type: none"> <li>✓ Review allegations of GBV to determine if: <ul style="list-style-type: none"> <li>❖ it corresponds to the definition of SEA/SH ; and determine whether the alleged perpetrator is a person associated with the project;</li> </ul> </li> <li>✓ Ensures that incidents are handled diligently;</li> <li>✓ Recommend actions to be taken, and by whom, to handle the incident: <ul style="list-style-type: none"> <li>❖ Specify the sanctions to be applied if the incident is confirmed. It should be noted that the Bank has zero tolerance for SEA/SH complaints.</li> <li>❖ Indicate the actions to be taken within the PULCCA to mitigate the consequences of the incident</li> </ul> </li> </ul>
GBV/SEA/SH support service providers	Focal points for health facilities, police or gendarmerie services, listening and advice services such as social center, center for the promotion of women and families, FBOs/CBOs.	<p>Proceed with the orientation and management of SEA/SH survivors while respecting.</p> <ul style="list-style-type: none"> <li>✓ Apply GBV/SEA/SH case management procedures.</li> <li>✓ Providing the essential services needed to help survivors</li> <li>✓ Mandatorily preserve the confidentiality, safety and security of survivors in accordance with best practices, including ensuring that processes are survivor-centered and making the sharing of personal data subject to their consent.</li> </ul>

		<ul style="list-style-type: none"> <li>✓ Inform the focal point and the GBV focal points at the different levels of the cases received for their recording in the complaints register in case the victim/survivor does not wish to do so.</li> <li>✓ Encourage and support survivors to use the GRM</li> </ul>
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It should be noted that, complaints relating to SEA/SH should under no circumstances be managed by village, sub-divisional, divisional nor regional committees.

**Table3: GBV-GRM action plan for capacity strengthening of stakeholders**

Stakeholders	Contents	Periods	Duration	Budget
PULCCA staff	<b>Commitment in the prevention of GBV/SEA/SH in all activities</b> General information on gender-based violence -Implementation of GBV/SEA/SH prevention measures in the activities of PULCCA and its partners as follows; ✓ Prevention tools (code of conduct, MGP, framework of responsibilities) -The role of GBV/SEA/SH to attend PULCCA's objectives -The necessity to mainstream GBV/SEA/SH in all components and how	Before the beginning of implementation activities	4 days	To be concerted with the social specialist for the general GRM
PULCCA and implementation partners	<b>Commitment in the prevention of GBV/SEA/SH in all activities</b> a.) General information on gender-based violence -Implementation of GBV/SEA/SH prevention measures in the activities of PULCCA and its partners as follows ; ✓ Prevention tools (code of conduct, MGP, framework of responsibilities) ✓ Awareness/training ✓ Development of the stakeholder network ✓ Referral and channels for survivors, ✓ Reporting and documentation of Incidents b.) Taking into account gender and GBV aspects in the implementation of activities (gender-sensitive TORs, GBV clauses, carrying out activities sensitive to gender and GBV/SEA/SH)	At the start of an activity activities  Revision bi annually	4days  2days	
PULCCA's service providers	<b>Commitment in the prevention of GBV/SEA/SH in all activities</b> a.) General information on gender-based violence Implementation of GBV/SEA/SH prevention measures in the activities of PULCCA and its partners as follows ;	Before implementation	3days	

	<ul style="list-style-type: none"> <li>✓ Prevention tools (code of conduct, MGP, framework of responsibilities)</li> <li>✓ Awareness/training</li> <li>✓ Development of the stakeholder network</li> <li>✓ Referral and channels for survivors,</li> <li>✓ Reporting and documentation of Incidents</li> <li>✓ Contribution towards GBV/SEA/SH/VAC in their activities</li> </ul>			
Community leaders (Traditional leaders, religious leaders, presidents of women's associations, girls)	<p><b>Commitment in the prevention of GBV/SEA/SH in all activities</b></p> <p>a.) General information on gender-based violence Implementation of GBV/SEA/SH prevention measures in the activities of PULCCA and its partners as follows ;</p> <ul style="list-style-type: none"> <li>✓ Prevention tools (code of conduct, MGP, framework of responsibilities)</li> <li>✓ Awareness/training</li> <li>✓ Development of the stakeholder network</li> <li>✓ Referral and channels for survivors,</li> <li>✓ Reporting and documentation of Incidents.</li> </ul> <p>N/B : These trainings will be done with some legal experts in the field GBV such as doctor, psychologist, lawyer, gendarme and police officer where possible in the locality</p>	Before the start of activities	3days	Revision quarterly for 2days. During revision, evaluation of difficulties/lessons will be drawn
Training of focal points/ GBV-GRM Committee regional/divisional	<p><b>Commitment in the prevention of GBV/SEA/SH in all activities</b></p> <p>a.) General information on gender-based violence Implementation of GBV/SEA/SH prevention measures in the activities of PULCCA and its partners as follows ;</p> <ul style="list-style-type: none"> <li>✓ Prevention tools (code of conduct, MGP, framework of responsibilities)</li> <li>✓ Awareness/training</li> <li>✓ Development of the stakeholder network</li> <li>✓ Referral and channels for survivors,</li> <li>✓ Reporting and documentation of Incidents</li> <li>✓ Their contributions not to further cause more violence or stigma to survivors</li> </ul> <p>b.) Role of focal points in the GBV prevention process</p> <ol style="list-style-type: none"> <li>I. Case management</li> <li>II. GRM</li> <li>III. Data management</li> <li>IV. The role of focal team</li> </ol> <p>N/B : These trainings will be done with some legal experts in the field GBV such as doctor, psychologist, lawyer, gendarme and police officer</p>	Before the start of activities	4days	Revision quarterly for 2days

Training of focal points/ GBV-GRM Committee Sub-divisional/ Village	<p><b>Commitment in the prevention of GBV/SEA/SH in all activities</b></p> <p>a.) General information on gender-based violence Implementation of GBV/SEA/SH prevention measures in the activities of PULCCA and its partners as follows ;</p> <ul style="list-style-type: none"> <li>✓ Prevention tools (code of conduct, MGP, framework of responsibilities)</li> <li>✓ Awareness/training</li> <li>✓ Development of the stakeholder network</li> <li>✓ Referral and channels for survivors,</li> <li>✓ Reporting and documentation of Incidents</li> </ul> <p>Their contributions not to further cause more violence or stigma to survivors</p> <p>b.) Role of focal points in the GBV prevention process</p> <ol style="list-style-type: none"> <li>I. Case management</li> <li>II. GRM</li> <li>III. Data management</li> <li>IV. Role of focal points</li> </ol> <p>N/B : These trainings will be done with some legal experts in the field GBV such as doctor, psychologist, lawyer, gendarme and police officer</p>	Before the start of activities Training	4days	Revision quarterly for 2days. During revision, evaluation of difficulties/lessons will be drawn
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## 10. ANNEXES

### Annex 01 GBV INTAKE FORM

<b>1. Administrative Information</b>		
Case ID No:	Survivor Code:	
Date of complaint :	Date of Incident	
<input type="checkbox"/> Reported by the survivor or by survivor's escort and survivor is present at reporting.		
<input type="checkbox"/> Reported by someone other than the survivor and survivor is not present at reporting		
<b>2. Survivor's Details</b>		
Date of Birth (approximate if necessary)	Sex <input type="checkbox"/> Female <input type="checkbox"/> Male	Location  Nationality/Ethnic origin
Name of Perpetrator (s)	Place of incident	Time of incident
<b>2. a. Current civil/marital status</b>		
<input type="checkbox"/> Single <span style="float: right;"><input type="checkbox"/> Divorced/Separated</span>		
<input type="checkbox"/> Married/Cohabiting <span style="float: right;"><input type="checkbox"/> Widowed</span>		
<b>2. b. Is the survivor a Person with Disability?</b>		
<input type="checkbox"/> Yes, if yes specify the type of disability. <span style="float: right;"><input type="checkbox"/> No</span>		
<b>2. c. Is the survivor a Child (i.e., less than 18 years)?</b>		
<input type="checkbox"/> Yes <span style="float: right;"><input type="checkbox"/> No</span>		
<b>3. Details of the Incident</b>		
Account of the incident/description of the incident (Summarize the details of the incident in survivor's own words)		
<b>4. Indicative type of incident, as specified by complainant.</b>		
<input type="checkbox"/> Sexual exploitation and abuse <input type="checkbox"/> Rape. <input type="checkbox"/> Sexual harassment <input type="checkbox"/> Psychological/Emotional Abuse <input type="checkbox"/> Physical assault <input type="checkbox"/> Psychological/emotional violence <input type="checkbox"/> Forced marriage <input type="checkbox"/> Denial of services, resources or opportunities		

<p><b>5. Were project benefits, goods, money and/or services exchanged in relation to this incident?</b></p> <p><input type="checkbox"/> Yes <span style="margin-left: 200px;"><input type="checkbox"/> No</span></p>
<p><b>6. Has the survivor reported this incident anywhere else? (If yes, select the type of service provider and write the name of the provider where the client reported; select all that apply)</b></p> <p><input type="checkbox"/> NO</p>
<p><input type="checkbox"/> Health/Medical Services:</p> <p>Specify _____</p> <p><input type="checkbox"/> Psychosocial/Counselling Services</p> <p>Specify _____</p> <p><input type="checkbox"/> Police/Other Security Actor</p> <p>Specify _____</p> <p><input type="checkbox"/> Legal Assistance Service</p> <p>Specify _____</p> <p><input type="checkbox"/> Other (specify)</p> <p>_____</p>
<p><b>PERSON COMPLETING THE FORM:</b></p>
<p>Name/ Title</p>
<p>Agency:</p>
<p>Date :</p>
<p>Signature:</p>

**ANNEX 02: COMPLAINT ACKNOWLEDGEMENT LETTER GENDER/GBV/ SEA/SH**

<p>[Your contact information here]</p> <p>[Date]</p> <p>Submitted _____ [in person or by mail/e-mail/telephone]</p> <p>Re: Complaint regarding [describe briefly]</p>
---



The PULCCA Project acknowledges that we received your complaint dated \_\_\_\_\_ [date].

The Project takes stakeholders' concerns seriously, and we thank you for submitting your complaint. We will make every effort to ensure that your complaint is considered quickly and fairly.

The information provided to us will be handled confidentially, it will only be revealed to immediate staff involved in the handling of your case. Care will be taken to ensure that unauthorized individuals do not overhear any discussion of your case, and access documents containing confidential information on your case.

Regarding the referrals made, you have every right to refuse or access the support or services recommended. Refusal to access them will not in any way affect your right to request or access that services at some time in the future. We also acknowledge your consent to (pursue/ not pursue) disciplinary action against the alleged perpetrator. This will be taken into consideration as we review and pursue the case further.

PULCCA has a gender grievance redress mechanism process that we follow to consider and resolve complaints. Attached is a description of the process, so you can learn more about it. In accordance with our grievance redress mechanism procedures, we will determine whether your complaint is eligible for our grievance resolution process and consider the next steps as relevant. We will contact you during this period should we need more information. Please refer to the attached grievance redress mechanism procedures for more information on what you can expect as we address your complaint, including timeframes, responsibilities, and your rights throughout the process.

You can expect to hear from us within 10 working days from the date of this letter.

Sincerely,

[Name of Focal Person]

[Organization or community]

### ANNEX 3: COMPLAINANT SATISFACTION FORM

Grievance ID Number:	Date Received:
Recorded by: Received	Place/Method Grievance was
Proposed Action (s)	
The claimant has ACCEPTED/SATISFIED the proposed action? <input type="checkbox"/> YES <input type="checkbox"/> NO	
Further Action Required? <input type="checkbox"/> YES <input type="checkbox"/> NO	
Complainant Acknowledgement	
I, the undersigned, hereby confirm my satisfaction/acceptance of resolution actions implemented to address my complaint.	

Signature/Thumbprint

Name:

Date

#### ANNEX 4: GRIEVANCE LOG GENDER/GBV/ SEA/SH COMPLAINTS

Case No.	Date Claim Received	Name of Person Receiving Complaint	Where/how the complaint was received	Ref No. of the complaint	Type of Incident	Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication & by whom)	Referral(s) provided	Did the survivor give consent to share their non-identifiable information?	Expected Decision Date	Decision Outcome (by GBV Services providers and relevant services)	Was Decision communicated to complainant? Y/N If yes, state when, by whom and via what method of communication	Was the complainant satisfied with the decision? Y/N State the decision. If no, explain why and if known, will pursue appeals procedure	Any follow up action (and by whom, by what date)?

#### ANNEX 5: HOTLINES

Toll Free help lines you can call at any time in the day or night		
Name	What it does	Numbers: MTN: ORANGE:
	Indicate the type of assistance the victim can receive	

#### ANNEX 6 MONITORING SHEET

Claim Information							Monitoring of the processing of the complaint			
# of com	Name and	Complaint	Description	Complaints	Complaints from	Complaints from	Expected	Acknowledged	Complaint	Feedback to

plaints	contact of the complainant	filing date	of complaint (Yes-No)	from communities Yes-No	workers Yes-No	beneficiaries Yes-No	processing date	ment of receipt of the complaint	resolved (Yes/No) and date	the complainant on the processing of the complaint (yes/no) and date

## ANNEX 7: QUARTERLY EVALUATION SHEET FOR MANAGEMENT COMMITTEES

### Identification

Village ..... of:  
..... Project:

Component: ..... Sub-division of:

..... Division of: .....

Region of: ..... Number of members of the complaints

management committee: ..... Number of operational members

during the period: ..... Number of complaints registered:

..... Number of complaints processed:

..... Number of complaints resolved at

community level: ..... Number of complaints/type transmitted to the

project: ..... Name the main difficulties encountered

when ..... handling ..... complaints:  
.....

.....  
.....  
.....

**What are the suggested solutions to these difficulties?**

.....  
.....  
.....  
.....

Annex 08: Conciliation minutes

**In the year two thousand.....and  
on.....**

**Following a complaint filed by: .....  
..... Against**

.....

**About..... A  
conciliation meeting was held between the parties cited in the presence of:**

.....

**..... At the end of this meeting, he the following was agreed:**

.....  
.....  
.....  
.....  
.....  
.....

Signed by:

The complainant

The party subject to the complaint

The Chairman of the complaints management committee

## **ANNEX 9: REPORTING FORMAT FOR QUARTERLY COMPLAINTS MANAGEMENT**

- I. Introduction
- II. Summary relating to the management of GBV/SEA/SH/VA complaints during the period concerned
- III. Number of complaints registered per type, per channel type
- IV. Number of complaints received per type and per channel type
- V. Average processing time
- VI. Number of complaints processed within expected timeframes
- VII. Percentage of justifiable complaints
- VIII. Difficulties encountered
- IX. Action Point

## **ANNEX10: MINUTES OF ESTABLISHMENT OF COMPLAINTS MANAGEMENT COMMITTEES**

Region of: ..... Province of: ..... Commune of:  
..... Locality of:..... Date (day, month and  
year):  
.....

Number of participants in the AGM: ..... Men: ..... Women: .....

Prerequisites:

- ✓ Summary presentation of PULCCA
- ✓ Presentation of the GBV-GRM
- ✓ Roles and responsibilities of members of the complaints management committee
- ✓ The necessary profile for the members of said committee
- ✓ Questions/answers

Election of members of the complaints management committee:

<b>Position</b>	<b>Key profile retained</b>	<b>Candidate number</b>	<b>Candidate Name</b>	<b>Mode of designation</b>

President				Voting: Consensus:
Secretary				Voting: Consensus:
Members				Voting: Consensus:

Signed by :

The elected president of the Committee:

PULCCA representative

## **ANNEX 11: SEA/SH COMPLAINT VERIFICATION FORM**

### **TO BE FILLED BY THE PIU SAFEGUARDS SPECIALIST**

#### **INTRODUCTION:**

**THIS FORM SHOULD GUIDE THE VERIFICATION PROCESS BY THE SEA/SH VERIFICATION COMMITTEE. THE VERIFICATION**

**STRUCTURE WILL BE IN THE FORM OF A COMMITTEE, WITH AT LEAST THREE MEMBERS, WHICH WILL BE CONVENED IN AN**

**AD HOC MANNER DEPENDING ON THE NATURE OF THE INCIDENT. IF PERMITTED BY THE SURVIVOR, A REPRESENTATIVE**

**FROM A SERVICE PROVIDER SHOULD PARTICIPATE IN THE VERIFICATION COMMITTEE IN ORDER TO PROVIDE ADVOCACY ON**

**BEHALF OF THE SURVIVOR AND ENSURE THAT SURVIVOR CARE PRINCIPLES ARE RESPECTED THROUGHOUT THE PROCESS.**

#### **SEA/SH DEFINITION:**

#### **SEXUAL EXPLOITATION**

**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 HARASSMENT**

**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.**

**THE VERIFICATION COMMITTEE IS TASKED TO REVIEW AVAILABLE INFORMATION ABOUT THE SEAH CLAIM IN QUESTION,**

**THE NATURE OF THE CLAIM, AND WHETHER THERE IS A LINK WITH THE PROJECT. THE COMMITTEE WILL ALSO MAKE ITS**

**RECOMMENDATIONS TO THE ALLEGED PERPETRATOR'S EMPLOYER OR MANAGER AS TO APPROPRIATE DISCIPLINARY**

**SANCTIONS.**

**IT SHOULD BE NOTED THAT THE OBJECTIVE OF THE VERIFICATION PROCESS IS TO EXAMINE ONLY WHETHER THERE IS A LINK**

**BETWEEN THE PROJECT AND THE REPORTED SEA/SH INCIDENT AND TO ASSURE ACCOUNTABILITY IN RECOMMENDING**

**APPROPRIATE DISCIPLINARY MEASURES. THE VERIFICATION PROCESS ESTABLISHES NEITHER THE INNOCENCE NOR THE GUILT**

**OF THE ALLEGED PERPETRATOR AS ONLY THE JUDICIAL SYSTEM HAS THAT CAPACITY AND RESPONSIBILITY. IN ADDITION, ALL**

**FINAL DECISIONS REGARDING DISCIPLINARY ACTIONS WILL REST SOLELY WITH THE EMPLOYER OR MANAGER OF THE ALLEGED**

**PERPETRATOR.**

**SECTION A:**

**HAS THE SURVIVOR PROVIDED HIS/HER INFORMED CONSENT EITHER VERBALLY OR IN WRITTEN FORM TO PROCEED WITH AN**

**INVESTIGATION?**

**YES ☐ NO ☐**

**IF YES, PLEASE COMPLETE THE FORM IN ITS ENTIRETY.**

**22 | P A G E**

**IF NO, PLEASE SEEK THE CONSENT OF THE SURVIVOR ONLY TO ANONYMOUSLY SHARE 1) THE COMPLAINT NUMBER, 2) THE**

**TYPE OF INCIDENT REPORTED AND THE DATE AND AREA OF THE INCIDENT, 3) THE ALLEGED PERPETRATOR'S CONNECTION**

**TO THE PROJECT (IF KNOWN), AND 4) THE AGE AND GENDER OF THE SURVIVOR.**

**SECTION B:**

**1. INFORMATION RELATED TO THE GRIEVANCE RAISER/GBV SURVIVOR**

**SURVIVOR CODE:**

**AGE AND SEX OF THE GBV SURVIVOR:**

**GIRL (<18) ☐**

**WOMAN (>=18) ☐**

**MAN (>=18) ☐**



**Boy (<18)** ☐

**OTHER** ☐

**UNANSWERED** ☐

## **2. INFORMATION RELATED TO THE SEAH ALLEGATION:**

**TIME, AREA AND DATE OF INCIDENT REPORTED BY THE SURVIVOR:**

**RAPE** ☐

**SEXUAL AGGRESSION** ☐

**IF RELEVANT, PLEASE SPECIFY:**

**SEXUAL EXPLOITATION AND ABUSE** ☐

**SEXUAL HARASSMENT** ☐

**HAS THE SURVIVOR RECEIVED ANY SERVICES? YES** ☐ **NO** ☐

**IF YES, PLEASE SPECIFY:**

**MEDICAL** ☐

**PSYCHOSOCIAL** ☐

**LEGAL** ☐

**SECURITY/PROTECTION:** ☐

**OTHER** ☐ **PLEASE SPECIFY:**

## **3. INFORMATION REGARDING THE LINK TO THE PROJECT:**

**IS THE ALLEGED PERPETRATOR LINKED TO THE PROJECT?**

**YE** ☐

**NON** ☐

**DO NOT KNOW** ☐

**NAME OF THE ALLEGED PERPETRATOR (IF KNOWN):**

**23 | P A G E**

**ROLE OF THE ALLEGED PERPETRATOR (IF KNOWN):**

**PIU STAFF** ☐

**CONTRACTOR WORKER** ☐

**ANY OTHER INDIVIDUAL ASSOCIATED WITH THE PROJECT** ☐

**NOT KNOWN** ☐

**HAS THE INCIDENT BEEN CONFIRMED AS CREDIBLE AFTER VERIFICATION?**

**YES** ☐ **NO** ☐ **VERIFICATION ONGOING** ☐

**END DATE OF THE VERIFICATION PROCESS:**

**DECISION TAKEN:**

**NO ACTION/SANCTION** ☐

**INFORMAL WARNING** ☐

**FORMAL WARNING** ☐

**ADDITIONAL TRAINING**

**LOSS OF SALARY** ☐

**SUSPENSION OF EMPLOYMENT** ☐

**LAYOFF WITH NOTICE** ☐

**LAYOFF WITHOUT NOTICE** ☐

**REPORT TO THE POLICE IF WARRANTED** ☐

**OTHER ACTIONS** ☐ **PLEASE SPECIFY:**

**DATE OF NOTIFICATION TO THE PERPETRATOR'S EMPLOYER/CONTRACTOR:**

**DATE OF NOTIFICATION TO THE GBV SURVIVOR:**

**NOTIFICATION OF THE IMPLEMENTATION OF THE DECISIONS/SANCTIONS: YES ☐ NO ☐**

**NOTIFICATION TO THE PIU YES ☐ NO ☐**

**NOTIFICATION TO THE WORLD BANK**

**YES ☐ NO ☐**

**NOTE BELOW ANY FOLLOW-UP COMMUNICATION WITH THE SURVIVOR: FOR EXAMPLE:**

**WHEN/IF A VERIFICATION HAS**

**BEGUN, OR THE ALLEGATION HAS BEEN DETERMINED TO HAVE AN INSUFFICIENT BASIS TO  
CONTINUE. IT MAY ALSO INCLUDE**

**CONCERNS RAISED BY THE VICTIM THROUGH THE VERIFICATION PROCESS.**