

**Western Africa Regional Digital Integration Project (WARDIP) –
(P176932) The Gambia**

Annex to the ESMF:

Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Action Plan

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1. Introduction and Context

1.1. Background

Gender-based violence (GBV) is the term used to denote harm inflicted upon individuals and groups that are connected to normative understandings of their gender. This connection can be in the form of cultural awareness of gender roles, both institutional and structural forces that endorse violence based on gender and societal influences that shape violent events along gender lines¹. While the term is often used synonymously with ‘violence against women, it can and does occur for people of all genders, including men, women, male and female children and gender diverse individuals.

Nonetheless, in traditional Gambian society, women are more often subjected to GBV based on their cultural roles and responsibilities, perpetuating inequality between men and women. In 2018, The Gambia was ranked 174th out of 189 countries with a score of 0.623, according to the UNDP Human Development Report’s Gender Inequality Index². It will be noted that the majority of the poor and extremely poor in the country is made up of women; generally, their access to land is based mainly on customary law where the land belongs to founding families, and the user rights of in-married women depend on the continuation of their marriage within the family. Furthermore, women often lack access to credit for income-generating activities and generally have a limited role in decision-making that affects their lives. This disadvantaged position of women in the family is deeply rooted in gender inequality, contributing to gender-based intimate partner violence.

Therefore, GBV can cause economic harm to an individual through, for example, property damage and restriction of access to resources; by impacting the person’s health and safety, leading to social exclusion; and by fostering dependency on their partners for all material needs which can often perpetuate the cycle of violence. It is essential to pay special attention to women, children, and youths during project implementation.

Given women and girls’ limited decision-making powers coupled with poverty, the current COVID 19 pandemics are likely to be exacerbated to heighten vulnerability to GBV in the communities. With the possible deployment of external personnel, including ICT workers, contracted workers, and other experts in the project areas, communities may be exposed to increased risks of sexual exploitation and abuse (SEA) by project workers. Moreover, GBV could result from internal community conflict and/or sexual exploitation of community members who are extorted for sexual favors regarding beneficial project support.

Thus, in accordance with the WB SEA/SH Good Practice Note for the Western Africa Regional Digital Integration Project (WARDIP) requirements, the SEA/SH action plan is prepared outlining the operational measures that will be put in place to prevent and respond project-related GBV, including managing related grievances. It incorporates codes of conduct for project sub-contractors and staff and other strategies to prevent risks of GBV from occurring and establishes procedures for managing related grievances. The project should allocate an appropriate budget to implement the SEA/SH action plan and assign the project social safeguard specialist to serve as a SEA/SH GBV main focal person to oversee the implementation of activities.

¹ Gender identity, gender-based violence and human rights. <https://rm.coe.int/chapter-1-gender-identity-gender-based-violence-and-human-rights-gende/16809e1595>

² Human Development Indices and Indicators. **2018** Statistical Update. https://hdr.undp.org/sites/default/files/2018_human_development_statistical_update.pdf

1.2 Description of the Project

1.2.1. Project Development Objective (PDO)

The Program Development Objective (PDO) is to increase access to broadband and digital services through developing and integrating digital markets in the Western Africa region.

To achieve this objective, the project will consist of five interlinked technical components and the Project Implementation and Coordination Component organized to address the key binding constraints for the development and attainment of a digital economy.

The proposed Project Development Objective (PDO)-level results in indicators for the WARDIP are categorized according to the two main cardinals of the PDO and may include:

Increase access to broadband and digital services

- Increase in the number of unique mobile broadband subscribers in the region and participating countries (of whom, female users);
- Decrease in the monthly price of 1GB mobile broadband data as a percent of country's average monthly GNI per capita
- Number of businesses accessing services digitally, of which %women-led

Development and integration of digital markets

- Number of SMEs adopting digital technologies and platforms for business purposes, of which % women-owned
- Increased volume of international traffic (Kbit/s per person)

1.2.2. Project Location

The project shall be located in the Greater Banjul Area and will have some programs implemented across the country in some regions such as Central River Region North (CRRN) and South (CRRS), North Bank Region, West Coast Region and Upper River Region North (URR).

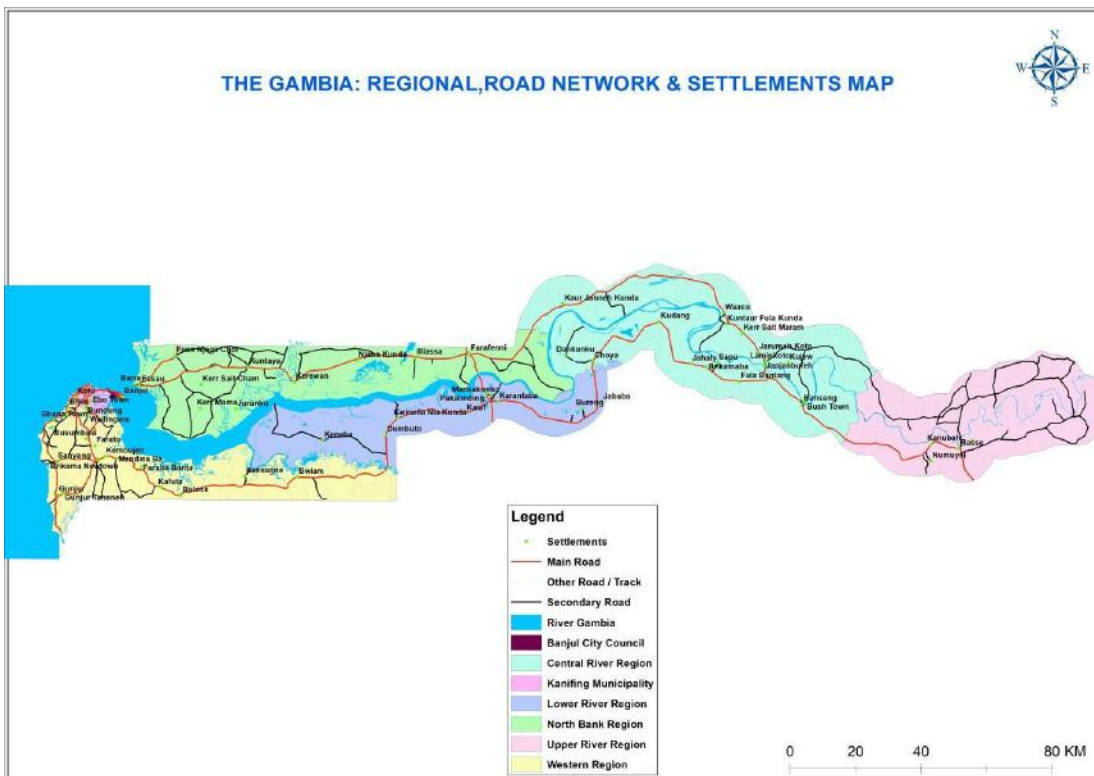


Figure 1. Map of The Gambia

1.2.3. Project components

There are five proposed project components:

Component 1: Connectivity Market Development and Integration

This component would support reforms to reduce barriers to the provision of cross-border telecoms services through open markets as well as broadband connectivity infrastructure deployment under an MFD approach.

Component 2: Data Market Development and Integration

This component aims to enable the secure exchange, storage, and processing of data across borders to support regional deployment and access to data-driven services, innovation, and infrastructure, including reducing regional restrictions on the free flow of data and increasing investments into data infrastructure.

Component 3: Online Market Development and Integration

The component aims to support the development and integration of the online market, which would enhance the enabling environment for the cross-border delivery and access of digital goods or services.

Component 4: Project Management and Implementation Support

Component 4 would provide technical assistance and capacity support for program preparation and implementation.

To support the Digitisation process, the World Bank (WB) is financing the preparation of The Western Africa Regional Digital Integration Project (WARDIP) for an amount of US\$ 45 million for five years.

Component 5: Contingent Emergency Response Component (CERC) (indicative US\$0 m, IDA)

In the context of the COVID-19 crisis, a Contingent Emergency Response Component (CERC) is added to the project structure to provide support to the participatory countries to respond to emergencies, including the COVID-19 crisis.

2. Principles of the SEA/SH Prevention and Response Plan

This plan aims to address Gender-Based Violence (GBV) and Sexual Exploitation and Abuse (SEA) Risks in the WARDIP.

The World Bank Group recognizes that World Bank-financed Projects can have the potential to increase the risk of GBV in different settings and ways. Based on the protocol set out in the WB SEA/SH Good Practice Note, it is a requirement to conduct a GBV risk assessment for the proposed WARDIP as there are possibilities of GBV risks increasing as a result of both contextual and project-related factors. Based on the assessment and consultation, the level of risks can be rated as “moderate”. The Risk Assessment highlighted the following potential major risk factors:

Limited/lack of enforcement - Implementation of policies and enforcement of laws is always a major challenge. Resource allocation to GBV activities and programs is sometimes limited. Gender statistics remain a key challenge to evidence-based gender-responsive policy-making and programming.

Labour influx and employment income differentials - No labour influx or worker’s camps are expected as most of local labour force will come from the project locations. However, sub-projects with limit employment opportunities may increase the demand for sex work, including the risk employment of women for sex returns; or the risk of forced early marriage for girls. Furthermore, higher wages for

workers in a community can lead to an increase in transactional sex. The risk of incidents of sex between workers and minors, even when it is not transactional, can also increase. Risk of SEA/SH by project personnel e.g., regional officials who may ask for sexual favors from women and girls for them to be included in the project economic supported activities, women groups, and other beneficiary groups or receive cash for compensation. Also, the project support can create a backlash and unintentionally heighten the risk of GBV amongst female participants especially given the existing high gender inequality and norms that do not promote women's economic independence. Rates of household violence can increase when a partner or family members feel threatened by or resentful of a woman's economic independence.

Consultations with key stakeholders on gender matters including GBV risks and processes, including women's groups, and other stakeholders need to be placed as part of the project ongoing process; community engagement and integration of local concerns and considerations. The vulnerability of girls and young women is related to early marriages, transactional sex, and, in some cases, rape and sexual coercion. In all these situations, women and girls have little or no ability to avoid sex or negotiate safer means. Girls are particularly disempowered to seek and receive health care, including HIV testing and treatment.

Limited/lack of supervision and hygiene facilities. It is likely that female employees will work alongside male workers without adequate supervision at work sites; without separate latrines and other sanitation facilities for males and females; and without specific mechanisms, for females to share concerns about their working environments, including concerns about sexual harassment.

Limited GBV coordination. The response to GBV is inadequate and uncoordinated. The government runs one shelter which caters to all persons in need of safety, and it is inadequate to cater to the needs of women threatened in their homes. The country also lacks a referral protocol, and most cases are instead dealt with informally. Specialized service providers are also lacking, and no government agency coordinates responses. Police officers are also not equipped to deliver adequate responses to victims of GBV. Advocacy programs, which are run by government and NGOs also lack coordination as do the many pieces of research that various actors have conducted. In addition, although there is a GBV network, it focuses on humanitarian issues; and because the project is not applied in a humanitarian environment, frameworks for coordinating GBV prevention and response may be limited and insufficient for the regional level, NGO, and CBO. Several CSOs also provide temporary shelters for GBV survivors.

Despite the potential risk factors highlighted above, The Gambia is one of the first countries on the continent to have adopted comprehensive legislation to domesticate the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW) and the African Protocols on the Right of Women in Africa (APRWA) through the enactment of the Women's Act in 2010.

3. SEA/SH Prevention and Response Plan

The main goal this plan is to propose appropriated GBV Risk Mitigation, to prevent and produce adequate response to SEA/SH for the WARDIP project.

3.1. Key measures

As part of the Bank's initiative to integrate GBV in **the WARDIP – The Gambia**, GBV risk mitigation measures should be planned. Key elements of the plan include:

- Create awareness on SEA/SH mitigation and response mechanisms within the implementing agency, PIU and contractors.
- Monitor GBV Risks and ensure it is adequately addressed in safeguard instruments.
- Updating ESMPs and C-ESMPs to include the SEA/SH prevention and response Action Plan.

- Stakeholder consultations including the participation of the communities that will take place throughout the project's life, every six months, will help inform GBV risks mitigation in the project.
- The Ministry of Communication and Digital Economy (MOCDE) Social Safeguards Specialist will carry out a GBV service providers mapping.
- Organize regular mentoring sessions for multi-sectoral service providers (Health, case management and psychosocial support, safety/police, and legal service providers) on GBV guiding principles.
- MOCDE Social safeguard Specialist to work with the Ministry of Gender, Ministry of Health, NGOs, GBV networks and other Multi-sectoral service providers to develop GBV referral pathways.
- Publicly post or otherwise disseminate messages prohibiting SEA/SH at project intervention sites, whether the project workers are perpetrators or survivors. This can include the development, adaptation, translation and dissemination of communication materials (through local and community radio, posters, banners, at community forums etc.) outlining unacceptable behavior on SEA/SH and where relevant referencing existing staff rules for civil servants, NGOs, and other actors in the project activities that may already be in place. Key messages to be disseminated shall include; i) No sexual or other favor can be requested; ii) Project staff are prohibited from engaging in sexual exploitation and abuse; iii) Any case or suspicion of sexual exploitation and abuse can be reported to the relevant authorities and; iv) the importance of timely services/services available.
- Project staff will sign Codes of Conduct (CoC);
 - CoC can be mentioned in routine project protocol briefings
 - Include session on SEA/SH awareness training, in the training and capacity building of the project team. The focus will be on sharing key messages (as above) with project staff including contractors and their staff
- The implementing entity should focus on establishing a referral pathway and training/orienting service providers/key stakeholders, at least on the guiding principles.

3.2 SEA/SH Prevention and Response Plan

- Establish GBV sensitive channels for reporting in the project Grievance Redress Mechanism (GRM)
- Clearly define the GBV requirements and expectations in the bidding documents and the necessary actions in the CoCs. See annex 2.
- The project relevant sites will ensure that separate on the site toilet and hygiene facilities are available and functional for men and women working, including inside-locking doors and appropriate lighting.
- Coordinate with school communities and organize activities/disseminate information on SEA targeting adolescent girls
- Operationalization of this SEA/SH Prevention and Response Plan: Project Annual Work Plan and Budget.
- The MOCDE will ensure the commitments and planned activities in this SEA/SH Prevention and Response Plan are operationalized through the project's annual work plan and budget. MOCDE must include environmental and social activities in this SEA/SH Prevention and Response Plan with the estimated budget in the annual work plan and budget.

1.2. Detailed Action Plan for the Program

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
a	<p>MOCDE Social Safeguard Specialist to support the implementation of the SEA/SH prevention and response Action Plan including the development of SEA/SH awareness materials, and the development of referral pathways.</p> <p>Update Social safeguard Specialist Staffs' ToR/Job Description to include GBV responsibilities.</p> <p>Identify GBV focal points at the Regional level for the MOCDE and other implementing partners such as GAMTEL/GAMCEL.</p>	At the beginning of the project implementation	MOCDE	NA	Follow up for its functionality	
b	<p>Develop Training Materials/key messages,</p> <p>in line with WB GBV Good Practice Note (GNP) recommendations, for project workers sensitization, community awareness and for sensitization targeting MOCDE management and Contractor management</p> <p>Develop training/communication materials and translate to respective local languages</p> <p>Print communication materials</p> <p>Develop communication and dissemination strategy</p>	At the start of the project period	MOCDE	To be managed within existing budgets	Training & communication Materials developed, Strategies developed	<p>Training materials Should include at least the following topics as recommended in the GPN:</p> <p>Definition of GBV, SEA and SH, and how the project can exacerbate/ contain GBV</p> <p>Roles and responsibilities of project stakeholders.</p> <p>Project staff Code of Conduct (CoC)</p> <p>Case reporting mechanism, accountability structures,</p>
c	Awareness briefings carried out for PIU both male and female, Regional	During preparation and	MOCDE	To be managed	Reports on briefings	MOCDE to provide technical support

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
	representative, and community level project stakeholders	implementation		within existing budgets		
2. GBV Risks adequately addressed in safeguards instruments						
a	Develop a SEA/SH prevention and response Action Plan including an Accountability and Response framework to be included in ESMP, including site- specific ESMPs	During the Project preparation and implementation	MOCDE	Part of regular staff activities	Ongoing review during implementation support missions. Update project ESMP if the risk situation changes.	WB and other relevant actors to provide technical support
b	Include in the project's social assessment the underlying GBV risks and social situation, using the GBV risk assessment tool	During preparation	MOCDE (assigned for social assessment and ESMP)	Follow-up for its functionality	Ongoing review during implementation support missions. Update project ESMP and Contractor's ESMP (C-ESMP) if risk situation changes.	
3. Stakeholder consultations to inform those affected by the project of GBV risks						
a	Consultations need to be continuous throughout the project cycle	Every quarter for entire life of the project	MOCDE	Part of regular activities	Monitoring of implementation Of Stakeholder Engagement Plan. Ongoing consultations, particularly	To be planned and plan submitted by MOCDE as part of the GBV Action plan

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
					when C-ESMP is updated.	
b	Engage a variety of stakeholders (political, cultural or religious leaders, health teams, local councils, social workers, women's organizations, NGOs and groups working with Children and girls)	Consultations need to be done on quarterly basis	MOCDE	Part of regular activities	Monitoring of Implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when C-ESMP is updated.	
c	Establish GBV response mechanism for workers and communities	Throughout Project Implementation	MOCDE	Part of regular activities	Monitoring of implementation of Stakeholder Engagement Plan.	
d	Conduct awareness/disseminate key SEA/SH messages targeting school communities (adolescent girls and women)	Throughout the project implementation	MOCDE	Part of regular activity	Information dissemination session report	As the project is implemented near schools and adolescent girls could be exposed to SEA by project staff/labour influx
4. Map out GBV prevention and response service providers						
a	Map out GBV prevention and response actors in project influence areas and beyond.	During preparation and Implementation	MOCDE, GBV focal point, and women and Children Affairs offices	To be covered by MOCDE	Update mapping as appropriate	WB to provide technical support as appropriate
b	Organize periodic induction/mentoring sessions for multi-sectoral GBV service providers on GBV guiding principles	During Project implementation (quarterly or every 6 months)	Social safeguard Specialist and regional GBV focal points		Monitoring session reports	

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
c	Support development of GBV referral pathways	During implementation	MOCDE Social safeguard Specialist, Regional GBV focal points and At regional level Ministry of gender	MOCDE	Review and update Referral pathways as needed	
d	Disseminate information, in collaboration with GBV partners, on GBV referral pathway and the importance of timely seeking services	During implementation	MOCDE & GBV service providers			Key GBV messages to be integrated in GBV service providers existing outreach strategies (e.g., health extension workers)
e	Review the IA's capacity to prevent and respond to GBV as part of Safeguard Preparation.	During Preparation and Implementation.	MOCDE	Part of regular activities	Ongoing review during implementation support missions. Update project ESMP if the risk situation changes.	
5. GBV sensitive channels for reporting in the Grievance Redress Mechanism (GRM)						
a	Make certain the availability of an effective grievance redress mechanism with multiple channels to initiate a complaint at MOCDE and regional levels. Establish SEA/SH allegations reporting channels Recommend including a GBV hotline (as appropriate)	Ongoing after amending contract with GBV Service Provider	MOCDE	Financed by the Project's budget	Regular monitoring and reporting on GRM to verify it is working as intended and evaluate its quality by MOCDE and WB	MOCDE and other actors review regularly GRM functions

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
	Conduct training of SEA/SH focal points					
b	Verify working GRM for GBV is in place and work with GBV Services Providers to raise awareness of the GRM and refer project-related cases to GRM as per survivors wishes and consent	During preparation of the project	MOCDE	Part of regular activities	Ongoing reporting	
c	Review that the GRM receives and processes complaints in a timely manner referring to an established mechanism to review and address GBV complaints.	During project implementation	MOCDE	NA	Ongoing reporting. Monitoring of complaints and their resolution	
6. Code of Conduct						
a	Project team to organize induction sessions for workers on a regular basis (within a month of any new hire) Review existing code of conduct to establish coverage of SEA/SH Factor key SEA/SH messages in the orientation training session for the Project team and collaborators. Raise awareness routinely on SEA/SH prohibitions and related messages (toolbox sessions/weekly/daily project staff briefing).	Once a month if there are new hires	GBV Specialist in GBV Service Provider	To be included in contract	Training reports	MOCDE ensure budget allocation
b	Evaluate the contractor's GBV response proposal in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV requirements.	During procurement time	MOCDE	NA	Reviewed by SC /safeguard team	
c	Contractor to present CoC and ensure that all workers and managers sign the	For all employees	Contractors	NA	Signed CoCs	MOCDE review CoCs to ensure minimum standards (WB to share

1. Create awareness on GBV in IA and contractors and the mechanisms that will be implemented						
	Action to Address GBV Risks	Timeline	Responsible Body	Budget	Monitoring	Remarks
	CoC. CoC must meet WB minimum standards					sample CoC contextualization to this project)
7. Separate toilet and shower facilities for men and women						
a	Site inspection to verify the existence	Prior to works commencing.	MOCDE	Regional officer and safeguard team	Site visit reporting, reviews during Implementation support missions.	
b	Contractor to ensure separate shower and toilet facilities are available.	Prior to works commencing.	Contractor/Supervision Consultant or Safeguard Team.	Part of regular Operational budget for contractor	Subsequent site visit report, Reviews during Implementation support missions.	

4. Annex

4.1. Annex 1: List of Social Workers Per Region With Their Contacts

Department of Social Welfare

No.	NAME	INSTITUTION	REGION	CONTACT
1.	Harriet Bass	DSW (Department of Social Welfare)	Greater Banjul and KM (Kanifing Municipality – Region One	9331273
2.	Haruna Badjie	DSW (Department of Social Welfare)	West Coast Region – Region Two	3756247
3.	Alasana Sanneh	DSW (Department of Social Welfare)	North Bank – Region Three	7814900
4.	Hamadi Jobe	DSW (Department of Social Welfare)	Lower River _ Region Four	3988940
5.	Ebrima Jassej	DSW (Department of Social Welfare)	Central River – Region Five	3410364
6.	Kebba Jatta	DSW (Department of Social Welfare)	Upper River – Region Six	7777061

LIST OF POLICE COMMISSIONERS IN VARIOUS REGIONS WITH THEIR CONTACTS

N ^o	Name	Institution	Region	Contact
1.	Commissioner of Police Alhagi Kinteh	Police Medic	Banjul – Region One	3912113/9912113
2.	Commissioner of Police Lala Camara	Banjul Headquarter	Banjul – Region One	9988168
3.	Commissioner of Police Adlime Basangeh	PIU (Police Intervention Unit)	KM (Kanifing Municipality – Region One)	2508276/9963032
4.	Commissioner of Police Amadou Sabally	Kairaba Station	KM (Kanifing Municipality – Region One	3950922
5.	Commissioner of Police Famara Jallow	Brikama	WCR (West Coast Region) Region Two	9966077/2145231
6.	Commissioner of Police AnsumanaKinteh	Kerewan	NBR (North Bank Region)	7763006
7.	Commissioner of Police Ma Lamin Sankareh	Bansang	CRR (Central River Region) Region Five	7778474/9976006

N ^o	Name	Institution	Region	Contact
8.	Commissioner of Police Omar Darboe	Basse	URR (Upper River Region) Region Six	7797375/9961113
9.	Commissioner of Police Banda	Mansakonko	LRR (Lower River Region) Region Four	7280920/3400002

NB: For Police Headquarter in Banjul, the Gender and child welfare officers are under the purview of the Assistant Inspector General of Police (AIG) Demba Sowe. Tel: 7763010.

LIST OF POLICE GENDER AND CHILD WELFARE OFFICERS IN ALL REGIONS WITH THEIR CONTACTS.

No.	Name	Institution	Region	Contact
1.	Jainaba Bojang	Police	Central River Region/Bansang	3948755
2.	Adama Sanneh	Police	CRR/ Janjangburay	3970305
3.	Awa Jallow	Police	CRR/Jareng	7511616
4.	Sarjo Barry	Police	CRR/Kuntaur	3970205
5.	Kawsu Fatty	Police	CRR/ Brikamaba	3970275/3188520
6.	Awa Ceesay (Station Officer)	Police	West Coast Region/New Yundum	3949282
7.	ASP Fatou Mboge	Police	West Coast Region/ Yundum – Region Two	3433326
8.	Foday Ceesay (Inspector)	Police	WCR/Brikama – Region Two	3950074
9.	Fatou Njie (Chief Inspector)	Police	WCR/ Brusubi – Region Two	3908032
10.	Bajen Samba (Chief Inspector)	Police	WCR/Brikama Misira, Kabafita Station – Region Two	3511058
10.	Ya Awa Njie	Police	WCR/ Brikama Jidah – Region Two	3949289
No.	NAME	INSTITUTION	REGION	CONTACT
11.	Sergeant Mariama Jarjou	Police	WCR/ Sukuta Station – Region Two	3949896
12.	Sergeant Mai Bah	Police	WCR/Farato – Region Two	3950302
13.	Adama Colley	Police	WCR/ Mandinaba – Region Two	3971983
14.	Corporal Kawsu Ceesay	Police	WCR/Tujereng – Region Two	7230255
15.	Corporal Mariama Darboe	Police	WCR/Old Yundum – Region Two	3972342

No.	Name	Institution	Region	Contact
16.	Sub Inspector Nyima Jammeh	police	WCR/ Mandinari – Region Two	3961271
17.	SG Dembo Manneh	Police	WCR/Sibanor – Region Two	3137754
18.	Corporal Aminata Daffeh	Police	WCR/ Latriya – Region Two	7748387
19.	Corporal Mariama Sambou	Police	WCR/ Kalagi – Region Two	3971984
20.	First Class Lamin Jammeh	police	WCR/ Sanyang Station – Region Two	7841065
21.	Corporal Mam Fatou Saidy	Police	WCR/Wellingara – Region Two	3997252
22.	Corporal Ida Sarr	Police	WCR/ Kunkujang – Region Two	3972477
No.	NAME	INSTITUTION	REGION	CONTACT
23.	Inspector Manyima Bojang	Police	WCR/ Salandinto – Region Two	3948532
24.	Fatou ceesay	Police	URR / Basse - Upper Region – Region Six	7999061
25.	Matarr Saidykhan	Police	URR/Basse - Upper Region – Region Six	2386189
26.	Marie Jain/Haddy Bah	Police	NBR/Farafenni – Region Three – Region Three	7079924/2024764
27.	Mariama Drammeh	Police	NBR/ Barra – Region Three	3970641
28.	Bakoto Secka	Police	NBR/Barra – Region Three	3146219
29.	Assistanct Commissioner Ramou Sambou (OC)	Police Headquarter Banjul	Police Headquarters – Banjul – Region One	3969299
30.	DSP Jainaba Bahoum	Serrekunda Station	KM (Kanifing Municipality – Region One	3950167

4.2. Annex 2 : Code of Conduct background

The purpose of these Codes of Conduct and Action Plan for Implementing ESHS and OHS Standards, and Preventing Gender Based Violence (GBV) and Violence Against Children (VAC) is to introduce a set of key definitions, core Codes of Conduct, and guidelines that:

- i. Clearly define obligations on all project staff (including sub-contractors and day workers) with regard to implementing the project’s environmental, social, health and safety (ESHS) and occupational health and safety (OHS) requirements, and;
- ii. Help prevent, report and address GBV and VAC within the work site and in its immediate surrounding communities.

The application of these Codes of Conduct will help ensure the project meets its ESHS and OHS objectives, as well as preventing and/or mitigating the risks of GBV and VAC on the project and in the local communities.

These Codes of Conduct are to be adopted by those working on the project and are meant to:

- i. Create awareness of the ESHS and OHS expectations on the project;
- ii. Create common awareness about GBV and VAC and:
 - (a) Ensure a shared understanding that they have no place in the project; and,
 - (b) Create a clear system for identifying, responding to, and sanctioning GBV and VAC incidents.

Ensuring that all project staff understand the values of the project, understand expectations for all employees, and acknowledge the consequences for violations of these values, will help to create smoother, more respectful and productive project implementation thereby helping ensure that the project’s objectives will be achieved.

4.2.1. Definitions

The following definitions apply:

Environmental, Social, Health and Safety (ESHS): an umbrella term covering issues related to the impact of the project on the environment, communities and workers.

Occupational Health and Safety (OHS): Occupational health and safety is concerned with protecting the safety, health and welfare of people engaged in work or employment. The enjoyment of these standards at the highest levels is a basic human right that should be accessible by each worker.

Gender-Based Violence (GBV): is an umbrella term for any harmful act that is perpetrated against a 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. The term GBV is used to underscore systemic inequality between males and females (which exists in every society in the world) and acts as a unifying and foundational characteristic of most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as “any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women.”³ The six core types of GBV are:

- **Rape:** non-consensual penetration (however slight) of the vagina, anus or mouth with a penis, other body part, or an object.
- **Sexual Assault:** any form of non-consensual sexual contact that does not result in or include penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks.

³ It is important to note that women and girls disproportionately experience violence; overall 35 percent of women worldwide have faced physical or sexual violence (WHO, Global and regional estimates of violence against women: prevalence and health effects of intimate partner violence and non-partner sexual violence, 2013). Some men and boys also face violence based on their gender and unequal power relationships.

- o **Sexual Harassment:** is unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts but always involves a power and gender dynamic in which a person in power uses their position to harass another based on their gender. Sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts).
- o **Sexual Favors:** is a form of sexual harassment and includes making promises of favorable treatment (e.g., promotion) or threats of unfavorable treatment (e.g., loss of job) dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- **Physical Assault:** an act of physical violence that is not sexual in nature. Examples include hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, acid attacks or any other act that *results* in pain, discomfort or injury.
- **Forced Marriage:** the marriage of an individual against her or his will.
- **Denial of Resources, Opportunities or Services:** denial of rightful access to economic resources/assets or livelihood opportunities, education, health or other social services (e.g., a widow prevented from receiving an inheritance, earnings forcibly taken by an intimate partner or family member, a woman prevented from using contraceptives, a girl prevented from attending school, etc.).
- **Psychological / Emotional Abuse:** infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, harassment, unwanted attention, remarks, gestures or written words of a sexual and/or menacing nature, destruction of cherished things, etc.

Violence Against Children (VAC): is defined as physical, sexual, emotional and/or psychological harm, neglect or negligent treatment of minor children (i.e., under the age of 18), including exposure to such harm,⁴ that results in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This includes using children for profit, labor⁵, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography.

Grooming: are behaviors that make it easier for a perpetrator to procure a child for sexual activity. For example, an offender might build a relationship of trust with the child, and then seek to sexualize that relationship (for example by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Seduction of Children /Online Grooming: By the use of deception, coercion, debt bondage or any means whatsoever, induce a child to go from one place to another to do any act with intent that the child may be, or knowing that it is likely that he or she will be, forced or seduced to have sexual intercourse with another person⁶.

⁴ Exposure to GBV is also considered VAC.

⁵ The employment of children must comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age. They must also be able to meet the project’s Occupational Health and Safety competency standards.

⁶ GoTG (2005) Children’s Act, 2005,section 27 (1)

Accountability Measures: are the measures put in place to ensure the confidentiality of survivors and to hold contractors, consultants and the client responsible for instituting a fair system of addressing cases of GBV and VAC.

Contractors Environmental and Social Management Plan (CESMP): the plan prepared by the contractor outlining how they will implement the works activities in accordance with the project's environmental and social management plan (ESMP).

Child: is used interchangeably with the term 'minor' and refers to a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

Child Protection (CP): is an activity or initiative designed to protect children from any form of harm, particularly arising from VAC.

Consent: is the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age⁷ Mistaken belief regarding the age of the child and consent from the child is not a defense.

Consultant: is as any firm, company, organization or other institution that has been awarded a contract to provide consulting services to the project and has hired managers and/or employees to conduct this work.

Contractor: is any firm, company, organization or other institution that has been awarded a contract to conduct infrastructure development works for the project and has hired managers and/or employees to conduct this work. This also includes sub-contractors hired to undertake activities on behalf of the contractor.

Employee: is any individual offering labor to the contractor or consultant within country on or off the work site, under a formal or informal employment contract or arrangement, typically, but not necessarily (e.g., including unpaid interns and volunteers), in exchange for a salary, with no responsibility to manage or supervise other employees.

GBV and VAC Allegation Procedure: is the prescribed procedure to be followed when reporting incidents of GBV or VAC.

GBV and VAC Codes of Conduct: The Codes of Conduct adopted for the project covering the commitment of the company, and the responsibilities of managers and individuals with regards to GBV and VAC.

GBV and VAC Compliance Team (GCCT): a team established by the project to address GBV and VAC issues.

Grievance Redress Mechanism (GRM): is the process established by a project to receive and address complaints.

Manager: is any individual offering labor to the contractor or consultant, on or off the work site, under a formal or informal employment contract and in exchange for a salary, with responsibility to control or direct the activities of a contractor's or consultant's team, unit, division or similar, and to supervise and manage a pre-defined number of employees.

Perpetrator: the person(s) who commit(s) or threaten(s) to commit an act or acts of GBV or VAC.

⁷ GoTG (2005) Children's Act, 2005, interpretation section 2 (1)

Response Protocol: is the mechanisms set in place to respond to cases of GBV and VAC (see Section 4.7 Response Protocol).

Survivor/Survivors: the person(s) adversely affected by GBV or VAC. Women, men and children can be survivors of GBV; children can be survivors of VAC.

Work Site: is the area in which infrastructure development works are being conducted, as part of the project. Consulting assignments are considered to have the areas in which they are active as their work sites.

Work Site Surroundings: is the ‘Project Area of Influence’ which are any area, urban or rural, directly affected by the project, including all human settlements found on it.

4.2.2. Company Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence against Children

The company is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The company is also committed to creating and maintaining an environment in which gender based violence (GBV) and violence against children (VAC) have no place, and where they will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception:

General

1. The company—and therefore all employees, associates, representatives, sub-contractors and suppliers—commits to complying with all relevant national laws, rules and regulations.
2. The company commits to full implementing its ‘Contractors Environmental and Social Management Plan’ (CESMP).
3. The company commits to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV and VAC are in violation of this commitment.
4. The company shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives, including sub-contractors and suppliers.
6. The company will follow all reasonable work instructions (including regarding environmental and social norms).
7. The company will protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste).

Health and Safety

8. The company will ensure that the project’s occupational health and safety (OHS) Management Plan is effectively implemented by company staff, as well as sub-contractors and suppliers.

9. The company will ensure that all persons on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment.
10. The company will:
 - i. Prohibit the use of alcohol during work activities.
 - ii. Prohibit the use of narcotics or other substances which can impair faculties at all times.
11. The company will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided to those working on the project.

Gender Based Violence and Violence against Children

12. Acts of GBV or VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate referral to the Police for further action.
13. All forms of GBV and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or within the local community.
 - i. Sexual Harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior, is prohibited.
 - ii. Sexual favors —for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior are prohibited.
14. Sexual contact or activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.
15. Unless there is full consent⁸ by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the workplace are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
16. In addition to company sanctions, legal prosecution of those who commit acts of GBV, or VAC will be pursued if appropriate.
17. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and/or VAC by a fellow worker, whether in the same company or not. Reports must be made in accordance with project's GBV and VAC Allegation Procedures.
18. Managers are required to report and act to address suspected or actual acts of GBV and/or VAC as they have a responsibility to uphold company commitments and hold their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively the company commits to ensuring that:

⁸ **Consent** is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

19. All managers sign the project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.
20. All employees sign the project's 'Individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV or VAC.
21. Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
22. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
23. An appropriate person is nominated as the company's 'Focal Point' for addressing GBV and VAC issues, including representing the company on the GBV and VAC Compliance Team (GCCT) which is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).
24. Ensuring that an effective GBV and VAC Action Plan is developed in consultation with the GCCT which includes as a minimum:
 - i. **GBV and VAC Allegation Procedure** to report GBV and VAC issues through the project Grievance Redress Mechanism (Section 4.3 Action Plan);
 - ii. **Accountability Measures** to protect confidentiality of all involved (Section 4.4 Action Plan); and,
 - iii. **Response Protocol** applicable to GBV and VAC survivors and perpetrators (Section 4.7 Action Plan).
25. That the company effectively implements the agreed final GBV and VAC Action Plan, providing feedback to the GCCT for improvements and updates as appropriate.
26. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to ESHS and OHS standards, and the project's GBV and VAC Codes of Conduct.
27. All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the GBV and VAC Code of Conduct.

I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Company Code of Conduct or failure to act mandated by this Company Code of Conduct may result in disciplinary action.

Company name: _____

Signature: _____

Printed Name: _____

Title: _____

Date: _____

4.2.3. Manager's Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence against Children

Managers at all levels have a responsibility to uphold the company's commitment to implementing the ESHS and OHS standards, and preventing and addressing GBV and VAC. This means that managers have an acute responsibility to create and maintain an environment that respects these standards and prevents GBV, and VAC. Managers need to support and promote the implementation of the Company Code of Conduct. To that end, managers must adhere to this Manager's Code of Conduct and sign the Individual Code of Conduct. This commits them to supporting the implementation of the CESMP and the OHS Management Plan and developing systems that facilitate the implementation of the GBV and VAC Action Plan. They need to maintain a safe workplace, as well as a GBV-free and VAC-free environment at the workplace and in the local community. These responsibilities include but are not limited to:

Implementation

1. To ensure maximum effectiveness of the Company and Individual Codes of Conduct:
 - i. Prominently displaying the Company and Individual Codes of Conduct in clear view at workers' camps, offices, and in public areas of the workspace. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
 - ii. Ensuring all posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
2. Verbally and in writing explain the Company and Individual Codes of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the 'Individual Code of Conduct', including acknowledgment that they have read and agree with the Code of Conduct.
 - ii. Staff lists and signed copies of the Individual Code of Conduct are provided to the OHS Manager, the GCCT, and the client.
 - iii. Participate in training and ensure that staff also participate as outlined below.
 - iv. Put in place a mechanism for staff to:
 - (a) report concerns on ESHS or OHS compliance; and,
 - (b) confidentially report GBV or VAC incidents through the Grievance Mechanism (GM)
 - v. Staff are encouraged to report suspected or actual ESHS, OHS, GBV or VAC issues, emphasizing the staff's responsibility to the Company and the country hosting their employment, and emphasizing the respect for confidentiality.
4. In compliance with applicable laws and to the best of your abilities, prevent perpetrators of sexual exploitation and abuse from being hired, re-hired or deployed. Use background and criminal reference checks for all employees.
5. Ensure that when engaging in partnership, sub-contractor, supplier or similar agreements, these agreements:
 - i. Incorporate the ESHS, OHS, GBV and VAC Codes of Conduct as an attachment.
 - ii. Include the appropriate language requiring such contracting entities and individuals, and their employees and volunteers, to comply with the Individual Codes of Conduct.
 - iii. Expressly state that the failure of those entities or individuals, as appropriate, to ensure compliance with the ESHS and OHS standards, take preventive measures against GBV and VAC, to investigate allegations thereof, or to take corrective actions when GBV or VAC has occurred, shall not only constitute grounds for sanctions and penalties in

accordance with the Individual Codes of Conduct but also termination of agreements to work on or supply the project.

6. Provide support and resources to the GCCT to create and disseminate internal sensitization initiatives through the awareness-raising strategy under the GBV and VAC Action Plan.
7. Ensure that any GBV or VAC issue warranting Police action is reported to the Police, the client and the World Bank immediately.
8. Report and act according to the response protocol (Section 4.7 Response Protocol) any suspected or actual acts of GBV and/or VAC as managers have a responsibility to uphold company commitments and hold their direct reports responsible.
9. Ensure that any major ESHS or OHS incidents are reported to the client and the supervision engineer immediately.

Training

10. The managers are responsible to:
 - i. Ensure that the OHS Management Plan is implemented, with suitable training required for all staff, including sub-contractors and suppliers; and,
 - ii. Ensure that staff have a suitable understanding of the C-ESMP and are trained as appropriate to implement the C-ESMP requirements.
11. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the GBV and VAC elements of these Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the GBV and VAC Action Plan for addressing GBV and VAC issues.
12. Managers are required to attend and assist with the project facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations, including collecting satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.
13. Ensure that time is provided during work hours and that staff prior to commencing work on site attend the mandatory project facilitated induction training on:
 - i. OHS and ESHS; and,
 - ii. GBV and VAC required of all employees.
14. During civil works, ensure that staff attend ongoing OHS and ESHS training, as well as the monthly mandatory refresher training course required of all employees to combat increased risk of GBV and VAC.

Response

15. Managers will be required to take appropriate actions to address any ESHS or OHS incidents.
16. With regard to GBV and VAC:
 - i. Provide input to the GBV and VAC Allegation Procedures (Section 4.2 Action Plan) and Response Protocol (Section 4.7 Action Plan) developed by the GCCT as part of the final cleared GBV and VAC Action Plan.
 - ii. Once adopted by the Company, managers will uphold the Accountability Measures (Section 4.4 Action Plan) set forth in the GBV and VAC Action Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of GBV and VAC (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
 - iii. If a manager develops concerns or suspicions regarding any form of GBV or VAC by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he is required to report the case using the GRM.

- iv. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision to sanction was made
 - v. If a Manager has a conflict of interest due to personal or familial relationships with the survivor and/or perpetrator, he/she must notify the respective company and the GCCT. The Company will be required to appoint another manager without a conflict of interest to respond to complaints.
 - vi. Ensure that any GBV or VAC issue warranting Police action is reported to the Police, the client and the World Bank immediately
17. Managers failing address ESHS or OHS incidents or failing to report or comply with the GBV and VAC provisions may be subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director or equivalent highest-ranking manager. Those measures may include:
- i. Informal warning.
 - ii. Formal warning.
 - iii. Additional Training.
 - iv. Loss of up to one week's salary.
 - v. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
 - vi. Termination of employment.
18. Ultimately, failure to effectively respond to ESHS, OHS, GBV and VAC cases on the work site by the company's managers or CEO may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Manager's Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC requirements. I understand that any action inconsistent with this Manager's Code of Conduct or failure to act mandated by this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Printed Name: _____

Title: _____

Date: _____

4.2.4. Individual Code of Conduct

Implementing ESHS and OHS Standards

Preventing Gender Based Violence and Violence against Children

I, _____, acknowledge that adhering to environmental, social health and safety (ESHS) standards, following the project's occupational health and safety (OHS) requirements, and preventing gender based violence (GBV) and violence against children (VAC) is important.

The company considers that failure to follow ESHS and OHS standards, or to partake in GBV or VAC activities—be it on the work site, the work site surroundings, at workers' camps, or the surrounding communities—constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. Prosecution by the Police of those who commit GBV, or VAC may be pursued if appropriate.

I agree that while working on the project I will:

1. Attend and actively partake in training courses related to ESHS, OHS, HIV/AIDS, GBV and VAC as requested by my employer.
2. Will wear my personal protective equipment (PPE) at all times when at the work site or engaged in project related activities.
3. Take all practical steps to implement the contractor's environmental and social management plan (CESMP).
4. Implement the OHS Management Plan.
5. Adhere to a zero-alcohol policy during work activities, and refrain from the use of narcotics or other substances which can impair faculties at all times.
6. Consent to Police background check.
7. Treat women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
8. Not use language or behavior towards women, children or men that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
9. Not engage in sexual harassment—for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior (e.g., looking somebody up and down; kissing, howling or smacking sounds; hanging around somebody; whistling and catcalls; giving personal gifts; making comments about somebody's sex life; etc.).
10. Not engage in sexual favors—for instance, making promises or favorable treatment dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
11. Not participate in sexual contact or activity with children—including grooming or contact through digital media. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

12. Unless there is the full consent⁹ by all parties involved, I will not have sexual interactions with members of the surrounding communities. This includes relationships involving the withholding or promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
13. Consider reporting through the GRM or to my manager any suspected or actual GBV or VAC by a fellow worker, whether employed by my company or not, or any breaches of this Code of Conduct.

With regard to children under the age of 18:

14. Wherever possible, ensure that another adult is present when working in the proximity of children.
15. Not invite unaccompanied children unrelated to my family into my home unless they are at immediate risk of injury or in physical danger.
16. Not use any computers, mobile phones, video and digital cameras or any other medium to exploit or harass children or to access child pornography (see also “Use of children's images for work related purposes” below).
17. Refrain from physical punishment or discipline of children.
18. Refrain from hiring children for domestic or other labor below the minimum age of 14 unless national law specifies a higher age, or which places them at significant risk of injury.
19. Comply with all relevant local legislation, including labor laws in relation to child labor and World Bank’s safeguard policies on child labor and minimum age.
20. Take appropriate caution when photographing or filming children (See Annex 2 for details).

Use of children's images for work related purposes

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

21. Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
22. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
23. Ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
24. Ensure images are honest representations of the context and the facts.
25. Ensure file labels do not reveal identifying information about a child when sending images electronically.

Sanctions

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

⁹ **Consent** is defined as the informed choice underlying an individual’s free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age. Mistaken belief regarding the age of the child and consent from the child is not a defense.

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

I understand that it is my responsibility to ensure that the environmental, social, health and safety standards are met. That I will adhere to the occupational health and safety management plan. That I will avoid actions or behaviors that could be construed as GBV or VAC. Any such actions will be a breach this Individual Code of Conduct. I do hereby acknowledge that I have read the foregoing Individual Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to ESHS, OHS, GBV and VAC 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: _____