

**FEDERAL DEMOCRATIC REPUBLIC OF ETHIOPIA
MINISTRY of EDUCATION
PROGRAM COORDINATION OFFICE (PCO)**



REFUGEE EDUCATION INTEGRATION PROJECT

**Action Plan
for School related Gender Based Violence (SRGBV) and Sexual Exploitation and
Abuse (SEA) for Refugee and Host Community Schools**

**September 2021
ADDIS ABABA, ETHIOPIA**

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1. GEQIP-E AF Program Description

GEQIP-E AF is PforR Program with the Objective to support part of the Government's ESDP V and envisaged ESDP VI (2020/21-2024/25), particularly Government's commitment to ensure more equitable access to quality education by refugee and host communities. The PDO of the original project aims to assist the Government of Ethiopia in improving internal efficiency, equitable access, and quality in general education, will be maintained.

The proposed AF supports the expansion of the Program to additional schools in geographic regions serving refugee populations, Afar, Benishangul-Gumuz, Gambella, Somali, and Tigray. Specifically, the AF (i) introduce updated policy and institutional frameworks for effective integration of refugees into national education service provision; (ii) scale up selected existing activities and incentives to harmonize government systems to deliver quality education to refugee communities; (iii) introduce new activities and disbursement linked results (DLRs) to address challenges in refugee education, particularly to promote greater learning, inclusion and social cohesion, (iv) support the transition of refugee camp-based secondary schools, currently managed by NGOs under the auspices of the Administration for Refugee and Returnee Affairs (ARRA), to national administration by the Ministry of Education (MoE); and (v) provide support to existing MoE schools hosting large numbers of refugees to increase capacity and support integration of refugees students.

The proposed AF employs the PforR modality for a US\$40 million component to provide incentives to Government for harmonization and integration of refugee education. There, two new DLIs (DLI9 and DLI10) are introduced to existing GEQIP-E, supporting harmonization of refugee primary schools with MoE and REB services, and integration of secondary schools. These are: (i) DLI 9: Harmonization of services at refugee primary schools; and (ii) DLI10: Integration of refugee secondary education. The harmonization of services at refugee primary schools will be achieved through: (a) Improved in-service training for refugee incentive teachers; (b) Availability of Basic School Grants in refugee primary schools; (c) Provision of textbooks to refugee primary schools with REB/Woreda procurement, distribution and monitoring. Integration of refugee secondary education will be realized through: (a) transfer of secondary refugee schools to MoE/REB administration; and (b) support to host community schools for integration of refugee students.

In addition to the PforR modality, the proposed AF has an IPF component with an additional \$20 million to support capacity building and pilot activities. The IPF components are:

IPF Component 1: Enhanced capacity for harmonization and integration (US\$12 million) that will focus on (i) National and Regional Refugee Integration Facilities, and (ii) Capacity building to develop specialized capacity within MoE to address issues relating to refugee education.

IPF Component 2: Innovation to address key challenges in refugee education (US\$8 million) that targets (i) Disruptive technology for self-directed learning, (ii) Sports for social inclusion, (iii) Empowerment of girls: and (iv) Implementation of pilot activities through local NGOs. local NGOs will be contracted by Regional Refugee Integration Facilities to conduct implementation of pilot activities.

2. MoE's Work on Addressing GBV

Gender based violence (GBV) and Sexual Exploitation and Abuse (SEA) in and around schools, referred to as school related gender-based violence (SRGBV), adversely affects girls' and boys' enrolment, attendance, retention, and their learning outcomes. National and local educational policies promote girls and other at-risk groups safe access to educational opportunities. This allows pregnant girls to continue their education until they get their babies. Those who birth their babies during exams, have the right to take the exam at their home. But there are different reasons such as early marriage, poverty, lack of social support, socio-economic inequality and child labour which are the main cultural and social constraints that girls face and might limit their education attainment.

The overall Growth Enrollment Ratio (GER) in Refugee primary education is 69.6%. Nevertheless, the regional variation in GER is large: while Assosa and Jigjiga camps have the highest GER reported above hundred of 131.5% and 106.0% respectively, Samara is very much left behind with a GER of 13.5%. Camps like Gambella, Shire and Dollo Ado enroll a large share of their school-age population, more than 50% (**Refugee Gross Enrollment Ratio in Primary school, ESAA 2019/20**).

Girls in particular are vulnerable to sexual harassment, rape, physical abuse due to discrimination, child marriage, and exploitation from teachers, staff, peers, and out of school community on their way to and from school. CoC that stipulate the expected behavior and explicitly state to take measure on individual and groups the accountability of to prevent any violation related gender based at a national phenomenon in Ethiopia. Early marriage, internal conflicts, distance to schools, work burden on girls and limited facilities that female students experience may increase their vulnerability to violence.

The Ministry of Education liaises with other school- based compliant investigation, decision recommendation (committees, gender, clubs, departments, units etc) and none school-based sectors (health, justice, social protection, etc) to prevent and create referral pathways on GBV/ SEA against girls and boys including child marriage very serious concerns in the schools and around the schools. Therefore, MoE has accomplished different activities such as conducted Training of trainers (TOT) on gender mainstreaming, School Related Gender -Based Violence (SRGBV), Gender Responsive pedagogy, gender stereotype ,Sexual Harassment for Gender club coordinators, school principals, gender experts, teacher association representatives and students representatives including respecting the existing CoC regulation for zero tolerance to GBV/SEA by mobilizing stakeholders, development partners, local NGOs and local Community to overcome the problems.

Ministry of Education with the support of UNICEF has developed a draft GBV directive that includes Code of Conduct (CoC) in 2014 to address SRGBV in primary and secondary schools, Refugee and Host Community schools. The directive will be finalized and rolled out across all schools in Ethiopia. Schools have been reporting and addressing forms of violence experienced by students in schools and sometimes, outside school, such as sexual or extreme physical violence at home or in the community.

A GBV code of conduct (CoC) is under preparation that will be signed by all teachers and other project staffs including the construction workers prior to commencement of their jobs. The code of conduct will

be rolled out to all project targeted schools before the implementation of the project activities. Based on the lessons and experience of the implementation of the GBV action plan for GEQIP-E AF refugee integration program, the GBV action plan will be rolled out to the other schools targeted by the GEQIP-E parent program and the second GEQIP-E AF (GPE grant) after one years of GBV action plan in the GEQIP-E AF refugee integration

3. Definition of GBV/SEA

According to WB SEA/SH Good Practice Note, GBV is an umbrella term for any harmful act that is perpetrated against a person’s will and that is based on socially ascribed gender differences. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately affects women and girls across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps, during times of peace as well as in conflicts and crises. The term GBV stems from the 1993 United Nations (UN) Declaration on the Elimination of Violence against Women, which 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.” Discrimination on the basis of sex or gender identity is not only a cause of many forms of GBV, but also contributes to the widespread acceptance and invisibility of such violence—so that perpetrators are not held accountable, and survivors are discouraged from speaking out and accessing support.

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

4. Methodology

This GBV/SEA action plan was prepared through reviewing secondary data sources like World Bank guidance note, the GEQIP-E and its AFs Environmental and Social Systems Assessment, MoE’s draft GBV Code of Conduct and other related to GBV related documents in schools.

5. Addressing Gender Based Violence (GBV) - Sexual Exploitation and Abuse (SEA) and Sexual Abuse (SA) in GEQIP-E AF

Ministry of Education (MoE) is among the federal level government entity having regional and woreda levels counter parts with GEQIP-E implementation units. MoE has a newly drafted GBV code of conduct that will be applied in all schools throughout the country. MoE has Gender directorate responsible for the implementation of the new GBV code of conduct in close collaboration with the GEQIP-E and AF PCU.

The World Bank Group recognizes that Bank-financed projects can increase the risk of GBV in both public and private spaces by a range of perpetrators in several ways. Based on the protocol laid out in the WB SEA/SH Good Practice Note, a preliminary GBV risk assessment shall be conducted. This action plan was prepared based on the GBV risk assessment based on the available environmental and social risk instruments which shows the likelihood of GBV risks increasing because of both contextual and project related factors in schools. Based on the World Banks GBV risk assessment tool, GEQIP-E and its AFs are rated as “substantial”.

There are major risk factors highlighted in the Environment and Social Systems Assessment (ESSA) and other documents. This combines GBV/SEA/SH risk factors such as lack of access to hygienic menstrual health products/facilities, lack of sex disaggregated latrines, lack of GBV referral pathways, harmful traditional practices, norms, or dynamics that may increase girls’ vulnerability to violence in the school context, exposure to risks of GBV while walking long distances to school, weak stakeholder consultation and lack of social accountability, poverty levels, labor influx etc. Almost all the mentioned points are highlighted as the project risk factors.

MoE in collaboration with REBs will conduct safety audits periodically as part of the stakeholder consultation (example, applying international standards and guidelines for addressing GBV UN and IRC, UNICEF as a tool) to identify vulnerable groups. The safety audits would also identify the GBV/SEA/SH risks and emerging risks, safety in accessing schools, response services, GRM etc., if there are GBV hot spot areas and the audit would inform implementation.

6. Stakeholder Engagement activities and GBV Safety Audit

MoE has conducted stakeholder consultations during the preparation of the ESSA and other E&S risks management instruments. The assessments and consultations also include GBV risks as part of the E&S assessments. As noted above, this GBV action plan is prepared based on the E&S instruments.

Each school will conduct communities and stakeholder’s consultation to identify schools specific GBV risks and adopt their own specific GBV action plans with the support of RBEs. Consultation shall be conducted separately for girls and women prior to the preparation of school GBV action plans in a culturally and age-appropriate manner and in their local language. The consultation will be conducted to

identify emerging risks of GBV, raise awareness on the risks of GBV/SEAH covered by the project; and the mechanisms in place to address these risks and report incidents. mapping of existing GBV response services in their respective woredas, and incorporate community suggestions to address GBV. As noted above, as part of the stakeholder consultation, MoE in collaboration with REBs will conduct safety audits periodically applying international standards and guidelines for addressing GBV.

7. Action Plan

This section details the specific measures for mitigating GBV/SEA/SH risks under the GEQIP-E AF. These include the mitigation measures as well as steps to be undertaken to further mitigate and respond to risks and cases/allegation of GBV/SEA in the project sites.

The Action Plan includes activities that were done as well as those under progress to be completed. Although most of the activities have been accomplished to reduce the below mentioned risks, continually further works are required to minimize and address GBV risks in schools.

Action Plan for SRGBV and SEA

Component I: Safer Schools					
Risks	Mitigation Measures	Due date	Responsibility Body	Budget Source	Monitoring
<p>Sexual Exploitation and abuse and SH</p> <p>Develop a SEA/SH and response Action Plan including an Accountability and Response framework for project specific</p> <p>Include in the project’s social assessment the underlying GBV risks and social situation, using the GBV risk assessment tool</p>	<ul style="list-style-type: none"> - Engaging the community – community dialogue, engaging community leaders/PTA, messaging through IEC materials - Engaging the students – through establishment/ strengthening gender clubs, awareness raising at schools. Age-appropriate life skills training, gender sensitive SIP framework and Inspection, - Developing and implementing CoC – this may include signing of CoC by teachers and school staff, training teachers - Training education staff (including on CoC, referral pathways) to give them the tools to prevent and respond to SRGBV - Putting in place clear, safe and accessible procedures and mechanisms for reporting 	Every quarter	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSCs, ARRA	MoE/GEQIP-E AF	Regular monitoring and reporting to verify it is working as intended and evaluate its quality by MoE, REB and ARRA

	incidents, assisting survivors and referring cases to the appropriate authorities/services				
Early Marriage and FGM	<ul style="list-style-type: none"> - Conduct community awareness rising on the impact of early marriage and FGM, services available and reporting mechanisms - Establish network with NGOs working to address early marriage 	Every quarter	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSCs, ARRA	MoE/GEQIP-E AF	Regular
Lack of access to menstrual health hygiene products	<ul style="list-style-type: none"> • By mobilizing community (individuals, local investors, local NGOs and development partners (Engender Health, Child Fund, UNICEF)) to provide sanitary materials for girls. 	Quarter 2,3,4 (Q2, Q3 and Q4)	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSAs, ARRA	MoE/GEQIP-E AF	Regular monitoring and reporting to verify the distribution of sanitary materials by MoE, REBs and ARRA

	<ul style="list-style-type: none"> Establish and strengthen a safe menstrual hygiene health system by providing gender club guideline in the school compound inter alia using the School Grants 	Quarter 2 and 4(Q2 and Q4)	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSAs, ARRA	MoE/GEQIP-E AF	
	<ul style="list-style-type: none"> Strengthen and support girls' clubs in schools 	Quarter 2 and 4 (Q2, Q3 and Q4)	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSAs, ARRA	MoE/GEQIP-E AF	
Weak stakeholder consultation and lack of social accountability	<ul style="list-style-type: none"> School and local Community engagement Increase Social accountability through stakeholder consultation 	Functional Girls' club was already established in the schools. Support to the clubs will continue to ensure that target groups benefit from the clubs	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSAs, ARRA	MoE/GEQIP-E AF	Monitoring of implementation of Stakeholder Engagement Plan. Ongoing consultations, particularly when ESCP is updated.
Even if the GRM Committee was established, there was a	<ul style="list-style-type: none"> School and local Community engagement Increase Social accountability through 	The GRM committee was already	MoE/PCO and Women, Children and Youth	MoE/GEQIP-E AF	Regular monitoring and reporting

<p>lack of structured GRM to be responsive to GBV</p>	<p>stakeholder consultation</p> <ul style="list-style-type: none"> • Develop ToR detailing roles and responsibilities of the GRM • Establishing GRM committee • Training GRM committee/GRM operators on GBV/SEA basics, survivors centered approach, the referral pathway, reporting and confidentiality of data • Disseminate information on SR GBV GRM reporting procedures for school community (teachers/students/ PTAs ...) • Establishing multiple entry points/reporting lines for SRGBV cases • Establish clear and safe SEA/SH/SRGBV reporting protocol and referral system that facilitates safe access & referrals, handles data confidentially and defines accountability mechanism to handle SEAH allegations properly. • Develop simple, anonymous and confidential tracking system that GRM can use to document when they observe/support and refer 	<p>established at school level</p> <p>Regularly follow up will be undertaken to ensure that sustainable functioning of the GRM</p> <p>Safety audit will be conducted annually</p>	<p>Directorate, REBs, woreda officers, schools/PTSAs, ARRA</p>		<p>on GRM to verify it is working as intended and evaluate its quality by MoE and WB</p>
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	<p>GBV incidents to service providers.</p> <ul style="list-style-type: none"> • Conduct GBV safety audit 				
Lack of GBV referral pathways	<ul style="list-style-type: none"> • Map multi-sectoral GBV response services in the project implementation woredas 	Before implementation of project activities involving construction activities	REBs in collaboration with Woreda Education offices, ARRA,	MoE/GEQIP-E AF	Review and update Referral pathways as needed
	<ul style="list-style-type: none"> • Develop GBV referral pathway 		Woreda Education offices, ARRA, GBV services providers	MoE/GEQIP-E AF	
Component II: The SEA/SH risk mitigation -Construction					
Risks	Mitigation Measures	Due Date	Responsible Body	Budget Source	Monitoring
Safety on the way to and from school	<ul style="list-style-type: none"> • Awareness and consultations with the community • Walking in groups • Adults to supervised groups commuting to/from schools exposition 	Q2 and Q4	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSAs, ARRA	MoE/GEQIP-E AF	

Sexual exploitation and abuse in the school	<ul style="list-style-type: none"> Introducing safe space requirements to the School Construction Strategy, for instance low walls in the administrative offices, no locks and solid doors where not needed, etc., Enforce all teacher to sign the GBV code of conduct 	Every quarter	MoE/PCO and Women, Children and Youth Directorate, REBs, woreda officers, schools/PTSAs, ARRA	MoE/GEQIP-E AF	Information dissemination session report include exposure of girls to SEA by project staff/labor influx
Lack of sex segregated latrines (there was lack of separate toilet for girls and boys)	<ul style="list-style-type: none"> Establish and strength the availability of separate toilets for girls and boys The requirement to be introduced to the School Construction Strategy 	Continues during project activities implementation involving construction to ensure that the problem is solved as much as possible	MoE and REBs	MoE/GEQIP-E AF	Site visit reporting, reviews during implementation support missions. Follow up for its functionality
Risks associated with the labor influx for the construction sites	<ul style="list-style-type: none"> Training of the PIU management (SEA/SH, CoC, Accountability and response framework, GRM, role in supporting the SEA/SH Action plan implementation, services available) Regular awareness interventions targeting communities and 		MOE PCO, Gender REB, Woreda Education offices, ARRA, GBV services providers	MoE/GEQIP-E AF	Information dissemination session report include exposition of girls to SEA by project staff/labor influx

	<p>schools</p> <ul style="list-style-type: none"> • Training on SEA/SH for all construction workers • Signing of CoC and Commitment to the CoC by construction workers • Supervision of construction sites by local communities 				
Stakeholder consultations for the construction/ renovation of schools	<ul style="list-style-type: none"> • Officially inform the stakeholders (local municipalities, schools heads, construction workers, engineers) on the construction works intended in the project areas and project risks including GBV/SEAH • Sensitize the stakeholders on GBV/SEAH risks and where to seek confidential services • Conduct regular assessment to understand the risks and limiting factors that female and male labourers have in their working environment • Include the GBV risk mitigation measures in contractors bidding ToR 	<p>Prior to initiating construction.</p> <p>Maintained throughout Project implementation.</p>	Contractor, Social Safeguard Specialist	Cost covered under stakeholder consultation	Number of stakeholder consultations done

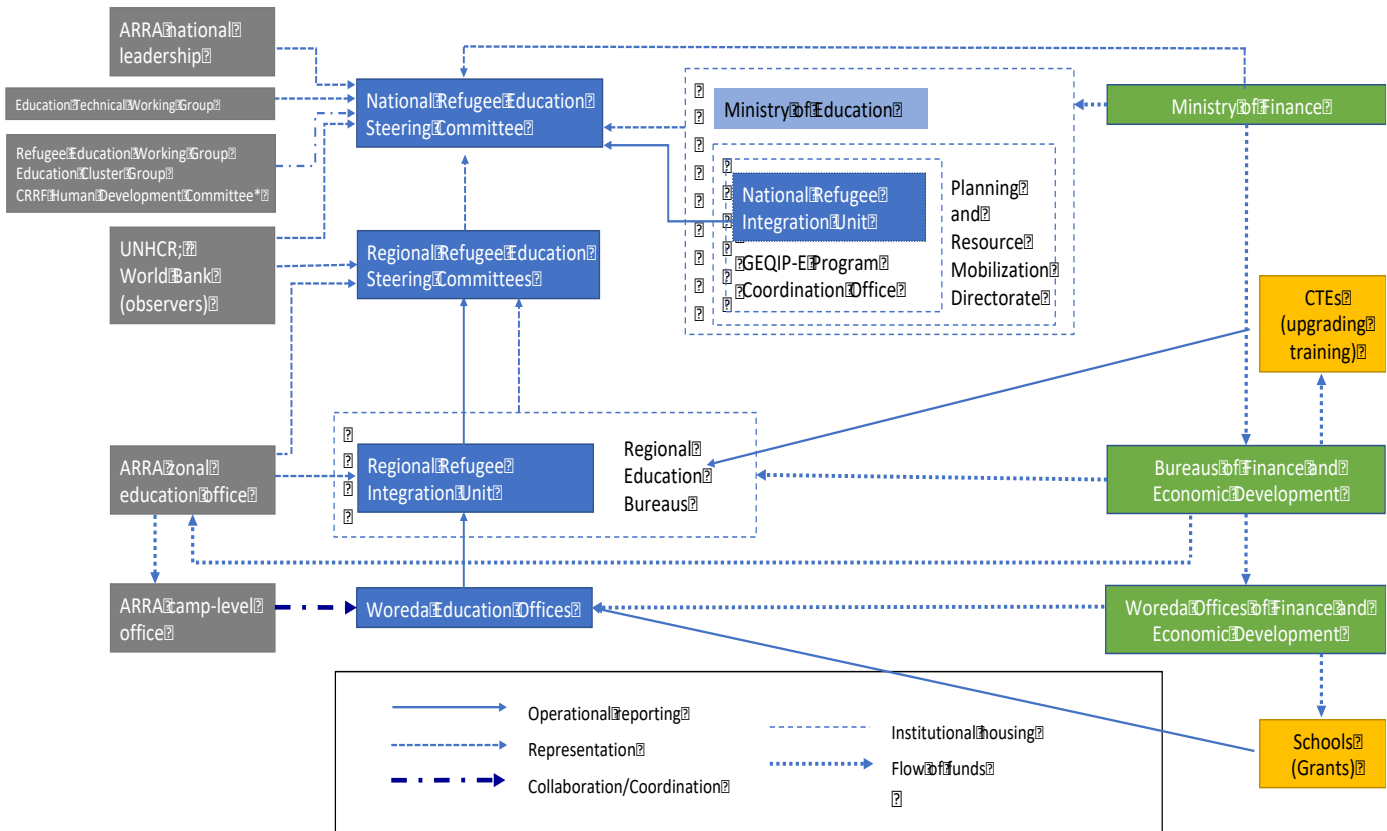
Refugee specific / targeted GBV and SEA	<ul style="list-style-type: none"> • Enhancing and promoting dialogue between refugees and host communities • Awareness creation on the SRGBV CoC for the construction workers 	Every quarter	MOE PCO, Gender REB, Woreda Education offices, ARRA, GBV services providers	MoE/GEQIP-E AF	Ongoing review during implementation support missions.
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8. Institutional Arrangements for Refugee Education and GBV/SEA Implementation
Arrangement, Reporting and Monitoring

8.1 Institutional Arrangements for Refugee Education

Governmental institutions at federal, regional, *Woreda* and refuge schools levels are responsible to take key roles on supporting, directing, and monitoring of the proposed program to ensure sound implementation of the required Gender Based Violence and Sexual Exploitation and Abuse prevention and protection practices during the implementation of Refugee Education project.

Figure 1 Institutional Arrangements for Refugee Education



(Source: POM)

8.2 GBV/SEA Implementation Arrangement, Reporting and Monitoring

At federal level, the MoE through Refugee Education Integration Environmental and Social Management Unit will be responsible for the implementation of the GBV action plan including the code of conduct. At regional and woreda level, the regional GEQIP-E environmental and social experts/focal persons will be responsible for conducting the GBV service mapping in collaboration with schools. The REBs will take the lead and responsibility for the overall implementation of the GBV action plan at school levels. The schools with the support from the woreda education office will conduct the GBV risks assessment to update the GBV action plan to their local context through consultation with the stakeholders.

MoE in collaboration with the World Bank GBV specialists will provide trainings on GBV risk mitigation measures for the project staffs, regional E&S specialists and focal persons. The REBs E&S specialists/focal persons will train the woreda level focal persons and school principals on GBV.

Based on the lessons and experience of the implementation of the GBV action plan for GEQIP-E AF refugee integration program, the GBV action plan will be rolled out to the other schools targeted by the GEQIP-E parent program and the second GEQIP-E AF for GPE. For the parent program and the second

GEQIP-E AF, the existing GQIP-E PCU will be responsible for the implementation of the GBV action plan in their respective project staff and beneficiary schools. The role our with take places after one years of GBV action plan in the GEQIP-E AF refugee integration project target schools to get better lessons for fast tracking the implementation of the action plan om the parent and GPE program targeted areas.

Besides, the environmental and social experts/focal persons in Refugee Education Integration Environmental and Social Management Unit and the GEQIP-E PCU, other stakeholders, like project staff, civil society organizations working in education and at school levels, gender clubs in schools, school principals and coordinators, etc. Each school will have a GBV action plan and the school principal will be responsible to coordinate and assign specific roles and responsibilities to the different stakeholders.

The RBEs will report GBV and SEA implementation performance status depending on the report and additional points to the MoE, Environmental and Social Management Unit (ESMU). This includes quarterly, bi-annual and annual social and school related gender-based violence (SRGBV) and sexual exploitation and abuse (SEA) reports. The quarterly report will be submitted between the date 1-5 of the next quarter, bi-annual report will be submitted in one month after the end of second quarter and the annual report in one month following the end of the fourth quarter (Ethiopian fiscal year).

The following are monitoring indicators:

- Number of workers who signed CoC
- Number of schools with safe space for students
- Number GBV/SEA/SA, FGM and early marriage awareness raising conducted
- Number of dialogues conducted between refugees and host communities
- Availability of separate toilets for girls and boys
- Established and strengthen safe menstrual hygiene system
- Availability of genders club guideline
- Type of support provided for girls' clubs in schools
- Established GRM committee to address GBV cases
- Training materials developed for the GRM committee on handing SRGBV
- Availability of multiple entry points/reporting lines for SRGBV cases
- Existence of GBV referral pathway

Annex 1:- GBV/SEA Individual Code of Conduct

Introduction

The teaching staff and project related worker of the Refugee Education Integration are required to read this Code of Conduct and sign. By signing, the code of conduct, the staff adhere to it by an act of commitment. Strict application of this Code in all Refugee Education Integration pre-primary, primary and secondary schools is required. This Code of Conduct defines the expected standards and behaviors that all teachers/ school staffs and project related workers should adhere during working and leisure time for personal engagement. It is complementary to other national social policy instruments that will be prepared by Ministry of Education at National Level and is based on the protection against sexual violence and others.

I, _____ and my working position/responsibility _____ have read, understand and agree to this Code of Conduct. I commit to the required standards of behavior and practice as outlined in adhering to environmental, social health and safety (ESHS) standards, the project's occupational health and safety (OHS) requirements, and preventing gender-based violence (GBV), Sexual Harassment (SH) and Sexual Exploitation and Abuse (SEA) is of utmost importance.

Article 1: Professionalism

- i) Employees shall perform any duties associated with their position in a conscientious, competent and honest manner,
- ii) Employees shall adhere to ethical and legal standards to be maintained in business;
- iii) Employees shall dress and act in public in a professional manner that does not reflect adversely on the organization or other employees,
- iv) Employee's use of social media shall not compromise the organization's reputation and include derogatory, shaming or other personal attacks towards or about employees, the governing body, volunteers, client or other stakeholders including communities of the project area,
- v) Employees shall maintain knowledge and skills at levels consistent with developments in technology, legislation and management necessary to carry out duties and responsibilities,
- vi) Employees shall keep the person in charge or delegate, informed of whereabouts and intended time of return, if going out independently, including during off-duty periods.
- vii) Employees shall not engage in any public and/or political activity which is unethical or unlawful.
- viii) Employees shall be aware of social and socio-political rank in communities and make sure that clan leaders, administrators and community elders are treated with the distinctive respect they deserve.

Article 2: Responsibility to Personal behavior

2.1 Employment relationships and respect to others

- i) Employers shall adopt and adhere to rules and conditions of employment that respect workers and, at a minimum, safeguard their rights under national, international labor and social security laws and regulations,
- ii) Employees shall treat each other with respect and courtesy, having regard for their dignity and rights,
- iii) Employees shall act fairly and equitably, respecting diversity in the environment which they work in and they shall prevent and respond to unlawful discrimination against other employees, volunteers, clients and stakeholders,
- iv) Employees shall avoid discrimination in dealing with the local community (including vulnerable and disadvantaged groups), the Employer's Personnel, and the Contractor's Personnel based on family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, political conviction or social, civic, or health status),
- v) Employees shall properly interact with the local community, members of the local community, and any affected person(s) by conveying an attitude of respect to their culture and traditions.

2.2 Harassment or Abuse

- i) The Project is committed to provide a work environment that is free of inappropriate behavior of all kinds and harassment because of age, physical disability, marital status, race, religion, caste, sex, sexual orientation or gender.
- ii) Employees shall not engage in sexual harassment and are prohibited to use language or behavior, towards women, men and/or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally unacceptable.
- iii) Employees shall 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.).
- iv) Employees shall not participate in sexual contact or activity with children below 18 years old, 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.
- v) Unless there is the full consent by all parties involved, employees shall 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.
- vi) Consider reporting through the Grievance Redressing Mechanism (GRM) or to the manager any suspected or actual GBV or SEA by a fellow worker, whether employed by the Project or not, or any breaches of this Code of Conduct.

- vii) Employees shall protect children/minors from any sexual activity or abuse and ensure their safety in project areas and avoid any unacceptable behavior towards children.
- viii) Employees shall 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).
- ix) Employees who are found engaged in SEA or GBV will be construed as misconduct that could lead to disciplinary action including but not limited to, dismissal or termination of employment, or referral to legal authorities, while providing service and referral to the survivor.

2.3. Alcohol, Drugs and Substances

- i) Employees shall not drink alcohol during working times and do so responsibly without compromising the health and safety of themselves and others during other times within the boundaries of the local laws and customs.
- ii) Employees shall not engage in the use or possession of alcohol, illegal drugs, narcotics or other controlled substances, which can always impair faculties, in the workplace and being under the influence of these substances on the job and during working hours is strictly prohibited. However, possession of prescription medication for medical treatment is permitted.
- iii) Employees shall not report for work under the influence of illicit drugs or alcohol. If a workplace participant is taking prescription medication, they are required to inform their manager. Workplace participants may be required to produce medical evidence to prove their medication does not affect their capacity to work and to work safely.
- iv) Employees must not have alcohol or illegal drugs in their possession while at work. The use, possession and/or trafficking of any illegal substances or drunkenness in company premises, work places, or using company facilities will result in immediate dismissal.

Article 2: Conflicts of interest

- i) Employees must avoid conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection). i.e. each employee is expected to avoid situations in which his or her financial or other personal interests or dealings are, or may be, in conflict with the interests of the Project.
- ii) Employees are advised not to engage in any other business, commercial, investment or any other activity(cultural, political, recreational, and social) that may conflict with the Company's interests and interfere with their ability to perform their duties to the Project.
- iii) Employees must not use any of Project's property, information or position, or opportunities arising from these for personal gains or to compete with or to tarnish the image of the Project.
- iv) Employees do not offer or accept gifts, benefits or favors that may influence or be reasonably seen to influence decision making.

- v) Employees shall disclose any potential conflicts of interest that might arise during the performance of the project.

Article 3: Responsibility to Safe Environment

Employers shall provide a safe and healthy workplace setting to prevent accidents and injury to health arising during work or because of the operation of employers' facilities. Employers shall adopt responsible measures to mitigate negative impacts that the workplace has on the environment.

- i) Employees should perform their duties in compliance with Environmental, Social, Health and Safety (ESHS) regulations and Occupational Health and Safety (OHS) requirements including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment.
- ii) Employees must take care or not put themselves or others at risk or reduce their ability to carry out their duties through unsafe practices, or inappropriate behaviors.
- iii) Employees shall promote the use of renewable and recyclable materials with the least use of natural resources, wherever possible,
- iv) Employees shall act in preventing, identifying and responding to workplace health and safety risks.
- v) Employees shall fulfill Sanitation requirements of the project
- vi) Employees shall drive cautiously in community roads as per the project traffic management plan,
- vii) Employees shall bring to the management's attention any workplace safety or health hazard issues immediately.

Article 4: Accountability

- i) Employees must comply with applicable laws, rules, and regulations,
- ii) Employees use equipment, facilities and funds for the primary purpose of undertaking organizational duties.
- iii) Employees shall provide services of a high quality that are technically correct, innovative and giving value for money.
- iv) Employees must respect reasonable work instructions (including regarding environmental and social norms).
- v) Employees must protect and properly use properties to be used for the execution of the project and prohibit theft, carelessness or waste.
- vi) Employees maintain confidentiality of all organization and personal information obtained during employment and other formal engagement with the organization and utilizes such information for the purposes of carrying out duties, and not for financial or other benefit, or to take advantage of another person or organization.

- vii) Employees shall avoid any deceitful and fraudulent conduct and act while carrying out their duties which are both dishonest and, in most cases, criminal based on the Project's financial integrity policy.
- viii) Employees prevent and respond to nepotism and patronage.
- ix) Employees maintain organization and personal records in accordance with legislative and organizational policy requirements.
- x) Employees ensure all decisions made during their duties are transparent and align with organizational policy and procedures.
- xi) Employees understand and comply with organization policies and procedures.
- xii) Employees are responsible for seeking clarification where needed regarding any part of their employment, including details of this Code of Conduct.
- xiii) Employees take responsibility for reporting conduct by other employees, governing body members or volunteers which contravenes any law, organizational policy and procedures, or this Code of Conduct.

Article 5: Adherence and Disclosure

- i) Employees shall undertake to abide by the Codes of Conduct,
- ii) Employees have a duty to report violations of this Code of Conduct,

Non-observance, violations or breach of this Code of Conduct shall be construed as misconduct that could lead to disciplinary action/sanctions including but not limited to informal or formal warnings, loss of salary, suspension of employment (either administrative leave or without payment of salary), termination of employment and Referral to police or other authorities as warranted.

I, _____ have read, understand and agree to this Code of Conduct. I commit to the required standards of behavior and practice as outlined in the Code of Conduct.

Employee signature _____

Date _____