

Annex 4: SEA/SH Prevention and Response Action Plan Template

Name of project: Sierra Leone Digital Transformation Project (SLDTP)

Client Name: Ministry of Information and Communication

Level of Risk Identified through Risk Screening: Moderate

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1. Introduction

This SEA/SH Prevention and Response Plan is prepared by MIC to meet the requirements of the World Bank’s Environmental and Social Framework (ESF) for the Sierra Leone Digital Transformation Project (SLDTP), specifically the Environmental and Social Standard on Community Health and Safety (ESS4). The Action Plan details the operational measures to assess and mitigate the risks of gender-based violence, most notably sexual exploitation, and abuse (SEA) and sexual harassment (SH), and how they will be integrated over the life of the project. This includes procedures for reporting, responding, and managing grievances related to such abuse. The Action Plan extends the GBV issues covered in the Environmental and Social Management Framework (ESMF) and is prepared in line with the protocol laid out in the WB SEA/SH Good Practice Note. It will guide the adequate allocation of resources to the social development practice within the PCU and underline the evaluation of social performance once all the measures are fully implemented.

2. Description of the project

The SLDTP reflects GoSL's commitment to transform its economy based on a more inclusive and human-centric digital growth and development approach. It seeks primarily to address challenges to achieving this vision, including high prices of connectivity and devices, significant gaps in access to broadband internet in rural areas and for women and marginalized groups, and inadequate capacity and skills to capitalize on digital opportunities and innovation. The project has five (5) components:

Component 1: Expanding Digital Access and Increasing Resilience of Digital Environment

This component aims to improve broadband market competition, expand access to broadband internet, and address existing digital divides in Sierra Leone. Sierra Leone continues to experience challenges in strategic parts of the broadband value chain, from the first mile where the internet enters the country to the last mile where it reaches end users. A mix of financing and technical assistance is expected to strengthen regulatory capacity and instruments to increase competition, lower prices and address some key connectivity gaps in Sierra Leone attracting private sector investments.

Component 2. Digital Skills Development and Innovation

This component aims to tackle Sierra Leone's digital literacy and innovation gaps by offering digital skills training for marginalized communities, enabling them to develop and utilize digital skills to improve their livelihoods and address challenges in their communities. This component will support vulnerable youth by enabling their participation in online and in-person digital skills training courses, thereby increasing their employment opportunities. The project will include targeted outreach and awareness-raising activities to recruit beneficiaries, including young women and youth with disabilities. Given that digital skills agenda is nascent in Sierra Leone, the design of digital literacy trainings will be based on a robust and detailed market assessment on the supply and demand of digital skills, as well as the analysis on the potential for youth to access livelihoods opportunities through the gig economy. Leveraging on Sierra Leone's progress in fostering drone use cases for development, the project will also include drone training for selected use cases and strengthening regulatory capacity for relevant regulatory bodies such as National Civil Aviation Authority (NCAA) and NATCOM.

Component 3. Laying Key Foundations for Digital Government Services and Systems

This component aims to build the core infrastructure and institutional capacity to strengthen digital public service delivery, build prioritized services and systems, and enhance the Government's operational efficiency. This Component is comprised of three mutually integrated subcomponents, namely: Subcomponent 3.1: Enabling environment for digital government; Subcomponent 3.2: Government Service Delivery Infrastructure and Networks; and Subcomponent 3.3. Demonstration of Digital Services and Systems.

Component 4: Project Management and Implementation Support

This component will finance the Borrower's project management and coordination capacity, including procurement, financial management (FM), monitoring and evaluation (M&E), environmental and social (E&S) safeguards management, project communication, and citizen engagement. This component will also cover modest office equipment and independent audits and learning/training for key beneficiaries (e.g., Project Coordination Unit (PCU) staff and the Technical Committee) to support the public sector's ability to build and retain skills for implementing whole-of-government digital transformation. Moreover, special attention will be devoted to promoting equal participation of women in all decision-making bodies under the project and contributing to tackling barriers in recruitment, retention, and promotion.

Citizen Engagement (CE) support will be financed under this subcomponent and include: (a) the development and implementation of a comprehensive grievance redress mechanism (GRM) to collect and respond to issues encountered by beneficiaries, system users, other system stakeholders, as well as the general population, including links between the GRM and M&E systems in order to improve project monitoring data; (b) the development of a comprehensive CE strategy and national consultation mechanism to ensure that all relevant stakeholders, including beneficiaries and marginalized groups, are consulted about the project design and implementation on at least an annual basis and the feedback from those consultations is fed back into the implementation plan and design of project-financed systems; (c) qualitative user research to identify barriers to accessing and successfully using project-financed systems and services, particularly barriers faced by marginalized groups and underserved populations, and inform the design and implementation of the activities; and (d) surveying usage and satisfaction of users of project-financed systems and services.

Component 5: Contingent Emergency Response Component (CERC)

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 Government to swiftly respond to an eligible crisis, including climate or natural disasters and public health emergencies. Including CERC at the preparation stage, albeit with zero funding, provides for flexibility for an agile response to an imminent or actual emergency (such as COVID-19) through quick disbursement of uncommitted balances from other components. The crisis response expenditures could cover, for instance, the facilitation of emergency payments to vulnerable groups of population using mobile money or ensuring business continuity of core government functions, when civil servants are required to continue home-based work. The CERC is not expected to finance civil engineering works that can induce risks and/or negative environmental and social impacts. However, CERC component is not added to finance any activities that include adverse environmental and social risks and impacts.

3. Project SEA and SH risks

As indicated, development projects have the potential to create or exacerbate risks of varying forms of GBV, including SEA and SH. For the SLDTP, key risks that may emerge include that:

- The project size and scope may limit opportunities for supervision and protection services. SLDTP is large in scale and size and will intersect with a variety of urban and rural communities, potentially in areas with minimal opportunities for supervision and with limited protection services, which all contributes to increasing risk of GBV/SEA/SH.
- Labour influx due to employment for last mile connections, although expected to be minimal and primarily of skilled workers, could exacerbate power imbalances via increase in income of workers from outside the communities coupled with lack of sanctions for inappropriate worker behavior. At the family and individual level, the project could create power imbalances at the household level by working only with men or women. At the individual level the project can create grievances; and it is responsible for distributing information on how to report them;
- Misinformation or lack of information throughout the components of the project could lead to self-censoring and disengagement by various groups of people in the communities, especially those with less agency and power;
- Community or local governance resolution processes might reinforce gender inequality pushing for resolutions that widen inequalities, are not survivor-centered and may lead to impunity and more harm to a survivor (through marriage to a perpetrator, re-victimization or other consequences);
- Women, girls, and other groups that have less power and status (marginalized groups) such as unmarried women/girls and minority ethnic/tribal groups are more likely to be invisible or hidden in community consultation and engagement processes, which reinforces harmful gender norms that deepen stereotypes that justify violence against such populations.
- Women and girls' exclusion from planning and design spaces can result in communications infrastructure that either ignores, or exacerbates, women and girls' risks of GBV/SEA/SH when accessing information and communication services; and
- Hiring and employment practices that seek to increase the number of women in different employment positions – from skilled labour within contractors (i.e. engineers) to community engagement officers – could expose women to incidents of sexual exploitation (pressure to perform sexual acts in exchange for work), harassment, or violence.
- IT equipment provided to selected public institutions at the central and local levels including schools and community-based digital access points could create conditions where project actors with power over the registration or enrolment process could exploit vulnerable beneficiaries.
- Project actors and trainers may also engage directly with beneficiaries in conducting the training with limited supervision, which increases the likelihood for SEA/SH to occur.

4. Risk Management Systems (status/proposed interventions)

The risks highlighted above to a certain extent will be mitigated by the implementation of project-wide measures by the PCU, as prescribed by this Action Plan. The Action Plan will build on available and planned mechanisms, as they are grounded in the organizations' experience in country or in their respective sectors. This allows for the most efficient use of available systems and avoiding duplication in initiatives. The measures proposed for mitigating and addressing GBV/SEA/SH risks to the project include:

- Hiring of a Social Safeguards Specialist in the PCU to ensure effective implementation of the Action Plan;
- Training the PCU and implementing partners on SEA/SH and supporting them in developing codes of conduct;
- Reviewing and providing timely feedback and inputs to contractors' SEA/SH Action plans as part of the kick-off meetings with awarded contractors;
- Training by project contractors of all project workers on the Code of Conduct outlining expectations for behavior related to SEA/SH, including prohibition of sexual activity with anyone under the age of 18 regardless of national laws, as well as sanctions for potential breach of the Code. Signing the CoC by all workers will be mandatory;
- Raising the awareness of all potential contractors on WB GBV requirements through pre-bid vendor conferences Drafting specific written guidance for contractors (guidelines and checklists) for preparing a simple GBV Action Plan to be included in the tender documents.
- Requesting the inclusion of a provisional sum in contractor bids to cover the referral of SEA/SH survivors with eligible complaints (i.e., complaints directly related to the implementation of the project) to existing service providers in project-affected areas to facilitate access to timely, safe and confidential services for survivors.
- SEA awareness and sensitization for communities (as part of the stakeholder engagement activities), led by designated community focal persons, and involving school children, where possible, to hear from them on potential project risks and inform them about SEA and reporting options;
- Identification of relevant organizations and community actors to provide information and support for GBV-related initiatives;
- Development of procedures and protocols to enable referral to services for survivors that are timely, confidential and survivor-centered and protect survivors from stigma and retaliation;
- Establishing clear internal confidential reporting and redress protocols for management of SEA/SH cases;
- Ensuring that the project-level Grievance Redress Mechanism (GRM) includes measures to enable reporting of SEA/SH complaints. The GRM will have multiple access options, trained staff and a specific protocol handling SEA/SH complaint so the right action is triggered. This protocol will be based on survivor-centered principles;
- Monitoring SEA/SH risks and mitigation measures continuously throughout the life of the project; and including tracking of implementation of the contractor SEA/SH Action Plans.

5. Action Plan

The Action Plan below presents operational activities as well as recommendations for GBV, SEA and SH risk mitigation measures that have been described in the foregoing sections. The measures build on existing mechanisms in project-affected areas in Sierra Leone and will be expanded upon and operationalized as the project planning and design evolves and the Environment and Social (E&S) Safeguards Specialist is hired. These measures will further be integrated into the Project Implementation Manual (PIM) and updated as needed throughout the life of the project. The Action Plan is organized around the following key actions (see the table below): (i) conduct a GBV/SEA/SH risk assessment across project sites; (ii) strengthen institutional capacity for SEA/SH risk mitigation and response; (iii) build the capacity of project implementation partners; (iv) establish SEA/SH channels for the GRM; (v) communicate to project-affected communities about SEA/SH risks and mechanisms; (vi) sensitize and build the capacity of contractors and suppliers; (vii) strengthen GBV services provision and referral pathways; and (viii) establish a reporting protocol (including an accountability matrix).

6. Monitoring and Supervision of the Action Plan

To ensure the implementation of the Action Plan, monitoring and supervision reports will be submitted by the PCU (or the Third Party through the PCU) on a quarterly basis. Each quarterly report will focus on:

- Ensuring that all SEA/SH mitigation activities proposed by contractors are fully implemented;
- Tracking (monitoring and reporting on) the effectiveness of implementation activities
- Re-assessment of risks and review of mitigation actions as appropriate;
- Identifying non-compliance and reporting any such concerns to the PCU, E&S Safeguards Specialist, and the World Bank; and
- Working with the implementing partner or contractor to develop a corrective action plan.

SEA/SH Prevention and Response Action Plan (Workplan)

	Activity to Address SEA/SH risk	Steps to be taken	Timeline	Responsible	Monitoring (Who will monitor)	Output indicators	Estimated Budget (\$)
1	Conduct a GBV/SEA/SH risk assessment across project sites						
a	Hire a Environment and Social (E&S) Safeguards Specialist in the PCU office	Hire an E&S Safeguards Specialist to supervise and provide technical support for the implementation of SEA/SH Action Plan	Project inception	PFMU	PCU	Existence of a qualified E&S Safeguards Specialist in the PCU	N/A
b	Conduct GBV/SEA/SH risk assessments for each subproject site of the project	GBV/SEA/SH risk assessments will be conducted for each subproject site before initiation of works as part of the technical assessment and general risk assessment for the project. The identified risks together with mitigating measures will be included in the Community Health and Safety Plan for the project sites	Project inception	Consultants	PCU	Number of GBV/SEA/SH risk assessment conducted (number of subprojects with potential risks evaluated)	20,000
2	Strengthen institutional capacity for SEA/SH risk mitigation and response						
a	Strengthen coordination and collaboration	Work with relevant GBV actors in Sierra Leone, in particular bodies focused on social protection, GBV, and child protection to tap into the existing referral system in project areas	Project implementation	E&S Safeguards Specialist	PCU	Number of GBV actors with whom the project has a relationship Number of GBV/SEA/SH actors identified and contacted	N/A

3	Build the capacity of project implementation partners						
a.	Sensitize and train implementing partner (IP) staff on expectations around SEA/SH	The PCU will conduct training sessions on GBV/SEA/SH for the staff of Implementing Partner organisations. The IPs will subsequently ensure that their direct workers, partners, sub-contractors, and suppliers are made aware of the Code of Conduct as part of their induction.	Project implementation	E&S Safeguards Specialist	PCU	Number of IPs trained	10,000
4	Establish SEA/SH channels for the GRM						
a.	Establish a GRM and train its operator in handling GBV/SEA/SH cases, using a survivor-centred approach	<p>A Grievance Mechanism that handles complaints and feedback from all stakeholders involved in the project will be established. Cases of GBV/SEA/SH can be reported through the main channels of the general Project.</p> <p>The GRM Operator will be trained on key protocols including referral, reporting and informed consent protocols to receive those cases in an appropriate manner and immediately forward it to the GBV/SEA/SH referral system.</p>	Project inception	E&S Safeguards Specialist/Consultant	PCU	<p>Existence of a GRM for the project</p> <p>Number of PCU staff and IPs trained in managing GBV/SEA/SH cases</p>	40,000
5	Communicate to project-affected communities about SEA/SH risks and mechanisms						
a	Develop guidelines and conduct community awareness on GBV/SEA/SH	Education and raising of awareness for project beneficiaries of SEA and their legal rights will be provided as part of project activities and stakeholders' engagements. Project beneficiaries will be made aware of the laws	Project implementation	E&S Safeguards Specialist, IPs, and subcontractors	PCU	Number of communities with knowledge of GBV/SEA/SH resources	50,000

		and services that protect them and provide redress in case of an incident. The project will create any necessary IEC materials with the help of the E&S Safeguards Specialist and supervision of the Bank. The Codes of Conduct will also be made available to the public in the project areas, especially to identified project stakeholders, to raise awareness of expected behavior of any project-related workers and mechanisms for reporting.				because of project implementation Number of CBOs with access to project GBV/SEA/SH resources	
b	Use gender-sensitive communication channels	Disclosure of this Action Plan will take place through multiple communication channels to be identified, taking into consideration women's safety when designing and distributing information.	Project implementation	E&S Safeguards Specialist, IPs, and subcontractors	PCU	Number of gender-sensitive communication channels identified	N/A
6	Sensitize and build the capacity of contractors and suppliers						
a	Organize pre-bid vendor conferences on GBV/SEA/SH requirements	Two vendor conferences for all suppliers and contractors will be held prior to the launch of tenders, to sensitize them to GBV/SEA/SH tender requirements	Project inception	E&S Safeguards Specialist/PFMU	PCU	Number of pre-bid vendor conferences organised Number of vendors participating in pre-bid conferences	2,000
b	Develop GBV/SEA/SH action plan guidance and checklists	The E&S Safeguards Specialist will develop guidelines and checklists for contractors on how to develop a simple and implementable GBV/SEA/SH action plan, which will be included as a tender requirement for high-value contracts.	Project inception	E&S Safeguards Specialist	PCU	Availability of guide notes and checklists for the GBV/SEA/SH Action Plan	5,000

c	Training of contractors	High-value contractors will be identified and trained on developing and implementing a GBV/SEA/SH Action Plan as per the developed guidelines and checklists.	Project implementation	IPs	PCU	Number of contractors trained.	
7	Strengthen GBV services provision and referral pathways						
a	Conduct GBV/SEA/SH service provider mapping	The PCU will recruit a service provider to map the capacity and quality of GBV/SEA/SH service providers in project areas with the objective of establishing effective referral pathways for survivors. The mapping tool will be developed with the MGCA and lead to a report that will serve as baseline data on service providers. The objective is to enable provision of quality response services for survivors (e.g., case management, medical, legal, and psychosocial support) in project areas.	Project inception	Service Provider/Consultant	PCU	Number of capable service providers in the referral system	80,000
b	Secure funding for GBV service referral	The PCU and its implementing partners will request the inclusion of a provisional sum in the budget of the contractor's GBV/SEA/SH action plan, to cover the referral of survivors with eligible complaints to existing services in project areas	Project inception	IPs	PCU	Percentage of work budgets allocated to GBV/SEA/SH case management	N/A
c	Establish referral pathways	The PCU will work with Ips and contractors to establish a GBV/SEA/SH referral system that will support survivors in receiving all necessary services they may choose, including medical, legal, counseling and accompaniment.	Project implementation	E&S Safeguards Specialist	PCU	Number of known referral pathways established	N/A

d	Popularize prioritized response actions for GBV/SEA/SH survivors	The PCU through the E&S Safeguards Specialist, IPs, and contractors will organize outreach sessions (targeting survivors or victims) across project sites to increase awareness of response actions taken by the project	Project implementation	E&S Safeguards Specialist, IPs	PCU	Number of dissemination meetings held with survivors Community members in project area aware of response actions due to public engagements facilitated by the project	5,000
8	Establish a reporting protocol (including an accountability matrix)						
a	Develop a strong SEA/SH reporting Protocol, based on survivor-centered principles, including confidentiality and respecting survivors' wishes	The PCU will develop a strong reporting protocol to ensure timely and safe reporting of SEA/SH incidents. Beneficiaries and communities should be informed of the availability of varying channels of reporting for allegations related to GBV/SEA/SH incidents. This will be made explicit in all community engagement sessions.	Project inception	E&S Safeguards Specialist, IPs, and subcontractors	PCU	Availability of a relevant reporting protocol	N/A
b.	Appoint GBV/SEA/SH focal points at subproject level who will be responsible cases and referrals	The E&S Safeguards Specialist will designate focal points for all sub-projects. The focal points will be responsible for referring GBV/SEA/SH complaints, if received directly and outside of the GRM. They will have specific responsibilities and will be trained on all relevant mechanisms. The focal points will also ensure appropriate response by i) providing a safe, non-judgmental, and caring environment and respect the confidentiality and	Project implementation	IPs, and subcontractors	PCU	Number of subprojects with active focal points	2,000

		wishes of the survivor; ii) provide reliable and comprehensive information on the available services and support to survivors; iii) If the survivor agrees, obtain informed consent, and make referrals.					
c	Manage GBV/SEA/SH cases	Cases will be reported through the established GRM, or directly to the service provider, if the incident concerns a direct worker or a worker from a subcontractor. Response options will similarly follow a survivor- centered approach. The IP or contractor should have in place procedures and processes for managing such cases. If deemed appropriate, those existing systems will be used; if there are gaps or such procedures do not exist, support will be provided by the PCU to establish them.	Project implementation	IPs, and subcontractors	PCU	Number of cases reported Number of cases successfully closed	IPs to set aside a percentage of their budgets for case management
d	Develop an accountability matrix	The E&S Safeguards Specialist will work with the Bank to develop an Accountability Matrix, which will articulate which parties are responsible for verification/investigation/overall management of cases relating to perpetrators within IPs/contractors should they occur. Using the matrix, all Ips will commit to timely and expeditious referral of survivors to service providers who will assist survivors per best practices allowed by the World Bank and local rules and regulations.	Project inception	E&S Safeguards Specialist	PCU	Approval of the accountability matrix developed for the project	5,000

e.	SEA/SH protocols in digital training setting	<ul style="list-style-type: none"> •Conduct Background checks of potential digital training providers •Extend code of conduct to cover trainers and administrative staff •Increase girls’ safety by considering locations closer to communities and inspecting physical locations for safety of the training centres •Expand GBV sensitive GRM, and referral services to the training centers •Extend accountability matrix to cover all employees of the project including training providers. •Include hiring more female trainers and one counsellor as SEA/SH focal point 	Project implementation	E&S Safeguards Specialist	PCU	Availability of protocol for managing SEA/SH risk in digital training centres.	
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