



Rural and Renewable Energy Agency (RREA)

Securing modern energy access for all Liberians

**Liberia Electricity Sector Strengthening and Access Project
(LESSAP)-Phase 2-Off Grid Component**

Sexual Exploitation and Abuse (SEA) and Sexual Harassments (SH) Action Plan

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Table of Acronyms:

Acronym	Full Meaning
GAP	Gender Action Plan
GBV	Gender-Based Violence
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment

RREA	Rural and Renewable Energy Agency
MoGCSP	Ministry of Gender, Children and Social Protection
MoH	Ministry of Health
LNP	Liberia National Police
WACPS	Women and Children Protection Section
GRM	Grievance Redress Mechanism
CoC	Code of Conduct
ESS	Environmental and Social Standards
ESS 1	Assessment and Management of Environmental and Social Risks and Impacts
ESS 2	Labor and Working Conditions
ESS 4	Community Health and Safety
ESF	Environmental and Social Framework
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
ILO	International Labor Organization
SDG	Sustainable Development Goals
RBF	Results-Based Financing
PIU	Project Implementation Unit
LESSAP	Liberia Electricity Sector Strengthening and Access Project

0.0 Executive Summary

This Gender Action Plan (GAP) for the Liberia Electricity Sector Strengthening and Access Project (LESSAP) – Phase II (Off-Grid Component) provides a comprehensive strategy to prevent, mitigate, and respond to SEA/SH(GBV), including Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) throughout the project lifecycle (2025–2027). Developed under the leadership of the Rural and Renewable Energy Agency (RREA), the plan reaffirms Liberia’s commitment to gender equality, social protection, and inclusive development, ensuring that all project-affected individuals, particularly women and vulnerable groups, engage safely and equally in project activities.

Grounded in national laws such as the Domestic Violence Act (2019), Decent Work Act (2015), and the Gender Equality Act (2021), and aligned with international frameworks including the World Bank Environmental and Social Framework (ESF), CEDAW, and ILO Convention No. 190, this plan integrates gender-responsive actions into every phase of the project.

Key actions include:

- Comprehensive GBV risk assessments in all off-grid project areas.
- Enforcement of a strict Code of Conduct (CoC) for all project staff, contractors, and subcontractors.
- Establishment of confidential, accessible reporting and referral systems for GBV incidents.
- Regular community sensitization and targeted gender-based training for all project stakeholders.
- Continuous monitoring, adaptive management, and evaluation using gender-disaggregated data.

GAP sets clear institutional roles:

- **RREA** leads coordination, compliance enforcement, and ensures gender safeguards are upheld.
- **Contractors/Subcontractors** are responsible for workforce compliance, monthly gender responsive reporting, and survivor centered support and case.
- **The GBV Committee**, comprising RREA, MoGCSP, MoH, LNP-WACPS, and contractors, oversees implementation, monitors incidents, and supports survivor-centered

services. As a key role, the Committee will coordinate GBV service mapping in each project county. This mapping will be conducted by specialized NGOs and service providers, under the leadership of RREA and in coordination with MoGCSP and relevant authorities, to identify, verify, and update referral pathways in line with the World Bank GRM Interim Note (2020)

Community stakeholders, including traditional leaders, play a vital role in awareness-raising and supporting culturally sensitive approaches to GBV prevention and response.

The plan is supported by a mapped network of GBV service providers across Liberia's 15 counties, including health facilities, safe homes, and legal aid centers, coordinated through the Ministry of Gender, Liberia National Police, and local partners. Contact information and referral pathways are integrated into the Grievance Redress Mechanism (GRM), ensuring survivors receive timely, confidential support.

All measures outlined are backed by a dedicated budget to ensure effective implementation and accountability. Through this plan, LESSAP Phase II promotes a safe, respectful, and inclusive project environment, contributing to Liberia's broader goals of sustainable, equitable energy access and strengthened social resilience.

1. Introduction

1.1 Project Background

This Plan provides a structured approach to addressing gender-specific risks and promoting gender equality in all phases of the Project. It outlines the preventive, mitigative, and responsive measures necessary to ensure that all individuals impacted by the Project are protected from gender-based risks, including sexual exploitation, abuse, and harassment. This Plan is central to creating a respectful, inclusive, and safe environment for workers, beneficiaries, and communities throughout the Project areas.

The development of this Plan draws from an extensive review of past and present gender-related reports, studies, legal frameworks, and policies. National laws, including the Domestic Violence Act, the Gender Equality Act, and the Decent Work Act, were thoroughly analyzed to ensure that the measures in this Plan comply with statutory obligations and reflect current best practices in gender protection and equality promotion.

Additionally, previous and ongoing projects and programs within Liberia were examined through a gender lens to extract lessons learned, challenges faced, and effective interventions that can inform this Plan. These include experiences from infrastructure, health, and education initiatives where gender considerations were integral to project design and execution. This process enabled the identification of persistent gender gaps and risk factors that may influence the implementation of the Project, particularly in rural and underserved communities.

Key stakeholders were engaged to provide insights on the socio-cultural dynamics influencing gender relations in the Project areas. These stakeholders included representatives from gender oversight institutions and national agencies responsible for social protection. Their contributions ensured that the strategies outlined in this Plan are contextually relevant and practically applicable.

The GBV Committee, established under the Project, played a central role in guiding the preparation of this Plan. The Committee ensured that the Plan reflects the realities on the ground, incorporating both national priorities and international safeguard commitments.

This Plan is not static. As the Project evolves, it will be subjected to continuous monitoring, with adjustments made as necessary to address emerging risks and challenges. The Plan ensures that gender equality is not only promoted but also safeguarded through clear, actionable, and enforceable measures, grounded in the legal and social context of the Project.

1.2 Purpose of the Gender Action Plan

The purpose of this Plan is to provide a comprehensive framework for identifying, preventing, mitigating, and responding to gender-specific risks within the Project. It establishes the basis for systematically integrating gender considerations into all activities, ensuring equitable access to opportunities, benefits, and protection for women, men, girls, and boys throughout the Project lifecycle.

This Plan addresses gender inequalities and vulnerabilities associated with labor influx, access to services, participation in decision-making, and exposure to risks of exploitation, abuse, and harassment. It sets out actionable strategies to promote gender equity, reinforce institutional accountability, and create safe, respectful, and inclusive environments for all individuals impacted by the Project.

It defines clear roles and responsibilities for the implementing entity and all relevant stakeholders to apply gender-sensitive practices consistently, from planning to completion. It also supports proactive community engagement to raise awareness on gender-related issues and to empower vulnerable and marginalized groups, including through economic participation.

This Plan ensures alignment with national legal frameworks, international standards, and safeguard requirements applicable to the Project. It reflects the commitment to uphold rights, dignity, and well-being, while guiding monitoring efforts to assess the effectiveness of gender interventions and enabling timely adjustments where needed.

1.3 Scope and Objectives of the GAP

This Plan sets the foundation for ensuring that gender equality and the prevention of SEA/SH are integral to all stages of the Project. It focuses on identifying, addressing, and mitigating gender disparities and associated risks, particularly those arising from the Project's activities, with special attention to the roles and responsibilities of all implementing actors.

The scope of this Plan extends across all phases of the Project, including planning, implementation, monitoring, and evaluation. It applies to all workers, stakeholders, and communities engaged by or affected by the Project. This Plan mandates the incorporation of gender-sensitive approaches in every aspect of the Project's operations, ensuring that women, girls, and other vulnerable groups are not only protected but actively included and empowered.

The objectives of this Plan are as follows:

- To promote equal participation of women and men in the Project's activities and decision-making processes.
- To prevent and respond to any form of gender-based violence, ensuring safe and respectful environments within the Project's areas of operation.
- To provide a framework for capacity building, awareness raising, and institutional strengthening in relation to gender equality and SEA/SH risk mitigation.
- To establish clear procedures for monitoring, evaluating, and reporting on gender-related outcomes, ensuring accountability and continual improvement.
- To ensure that all implementing actors, including contractors and subcontractors, are fully compliant with the gender-sensitive requirements and standards outlined in this Plan.
- To integrate the objectives of this Plan into the overall achievement of the Project's goals, reinforcing sustainable, inclusive energy access and development for all beneficiaries.

Oversight and compliance with the scope and objectives of this Plan shall be ensured by the GBV Committee, which will monitor progress, provide technical guidance, and recommend necessary adjustments to address emerging risks or gaps.

1.4 Alignment with National and International Policies

This Plan is aligned with key national legal and policy frameworks, as well as international standards relevant to gender equality, protection from violence, and inclusive development. At the national level, this Plan is consistent with the Constitution of Liberia, the National Gender Policy, the Domestic Violence Act (2019), the Revised Rape Law (2021), the Decent Work Act (2015), the Gender Equality Act (2021), and other applicable instruments that promote gender equality, protect human rights, and ensure safe and inclusive participation of women and marginalized groups in national development.

This Plan also draws from and supports relevant international instruments, including the Convention on the Elimination of All Forms of Discrimination Against Women, and contributes to the Sustainable Development Goals, specifically Goal 5 on Gender Equality and Goal 8 on Decent Work and Economic Growth. Furthermore, the Plan adheres to the requirements of international

donor frameworks, ensuring that gender considerations are central to risk assessment, stakeholder engagement, and implementation of all Project activities.

The GBV Committee shall play a key role in monitoring the continued alignment of this Plan with national and international frameworks, ensuring that any amendments or new standards are incorporated into the Project. Periodic reviews will be conducted to assess compliance and update measures as required. Through this alignment, the Project not only fulfills regulatory obligations but also contributes meaningfully to Liberia's broader commitments under national development strategies and international goals.

1.5 Key Stakeholders and Implementing Partners

The implementation of this plan depends on the effective collaboration of key stakeholders and implementing partners, each with a distinct role in ensuring that GBV/SEA/SH risks are addressed throughout the project.

- **Rural and Renewable Energy Agency:** Leads the coordination, implementation, and oversight of gender-sensitive measures and ensures compliance with this plan across all project activities.
- **RREA/PIU Social Safeguards Specialist (Focal Point):** Serves as the primary focal person for GBV/SEA/SH prevention and response. The Specialist provides technical leadership on safeguards, oversees grievance handling, and ensures compliance with the World Bank's requirements.
- **Gender Assistant (RREA/PIU):** Provides direct support to the Social Safeguards Specialist in implementing gender-sensitive measures, coordinating with GBV service providers, and maintaining records of grievance redress and survivor support. **Ministry of Gender, Children and Social Protection:** Provides technical leadership in gender mainstreaming, supports the development of responsive strategies, and ensures alignment with national gender frameworks.
- **Ministry of Health:** Ensures timely access to medical and psychosocial services for survivors and integrates health-related support into the referral system established under this plan.
- **Liberia National Police – Women and Children Protection Section:** Provides law enforcement support, facilitates investigations of GBV/SEA/SH cases, and ensures the safety of survivors in line with legal protocols.
- **GBV Service Providers/NGOs:** Conduct GBV service mapping, maintain referral pathways, and deliver survivor-centered services (medical, psychosocial, legal, and safe home support), in line with the World Bank GRM for SEA/SH in WB-Financed Projects (April 2020).

- **Grievance Redress Mechanism:** Receives and processes SEA/SH complaints, ensures confidentiality, facilitates referrals to appropriate services, and supports timely resolution in accordance with this plan.
- **Grievance Redress Committee:** Documents and tracks grievances related to gender-based violence, works closely with the SEA/SH Committee, and ensures that all cases are managed with sensitivity and confidentiality.
- **GBV Service Providers/NGOs:** Conduct GBV service mapping, maintain referral pathways, and deliver survivor-centered services (medical, psychosocial, legal, and safe home support), in line with the World Bank GRM for SEA/SH in WB-Financed Projects (April 2020). Specific providers are listed in Annex 3 (Service Providers and Referral Pathways).
- **SEA/SH Committee:** Oversees the implementation and monitoring of this plan, coordinates with all stakeholders, and ensures that gender-based risks are addressed effectively throughout the project lifecycle.
- **Local Government Authorities:** Support awareness efforts, ensure coordination at the county and district levels, and facilitate local-level implementation of gender-based strategies, facilitate referral linkages between community structures and formal GBV service providers.
- **Traditional Leaders:** Engage in community mobilization, promote non-violence, and support the cultural alignment of this plan's objectives.

Within the PIU, the Social Safeguards Specialist serves as the focal point, supported directly by the Gender Assistant, ensuring coordination across all stakeholders listed above. These stakeholders will collectively ensure that gender risks are mitigated, survivors are supported, and the project environment remains safe, inclusive, and responsive to gender concerns.

2.0 SEA/SH(GBV), SEA & SH Risks: Project and Contextual Assessment

2.1 Overview of Gender Gaps and GBV Risks: Context Related Risks

2.1 Project-Related Risks

The project introduces distinct GBV/SEA/SH risks that span civil work, service delivery, and institutional capacity. Phase I activities—including the electrification of ~300 health facilities, installation of 468 streetlights in Zorzor, Karweaken, and Barclayville, and the national RBF scheme for solar home systems—demonstrated that even small-scale contractor teams and vendor presence can heighten risks of harassment, transactional exploitation, and weak grievance uptake.

Phase II introduces a new Solar PV–BESS subproject at Bakuma (Lofa County), co-financed under LIRENAP, where cultural sensitivities, and heightened community expectations pose added GBV/SEA/SH risks. Specific concerns include potential misconduct by security staff at fenced facilities, harassment linked to the presence of external technical teams, and nighttime risks for women around construction and operation sites.

Table 2.1: Key Gender-Based Violence (GBV), SEA, and SH Risks in Project Areas

Identified Risk	Contextual Factor	Relevance to Project Activities	Risk Rating (GBV)	Alignment with ESF / Legacy Safeguards
Exploitation risk from labor influx	Temporary presence of contractor teams and service providers	Streetlight works, health facility electrification, RBF agents, and Solar PV–BESS site workforce	High	ESS2 (Labor & Working Conditions), ESS4 (Community Health & Safety); OP 4.01
Safety risks for women at health facilities	Limited night monitoring and inadequate security	Female health staff and patients at electrified facilities	High	ESS4 (Community Health & Safety), ESS1 (Risk Assessment & Management); OP 4.01
Night-time vulnerability of women and girls	Incomplete/uneven streetlighting coverage	Communities in Zorzor, Karweaken, Barclayville	High	ESS4 (Community Health & Safety), ESS10 (Stakeholder Engagement); OP 4.01

Misconduct linked to secured energy sites	Security personnel or contractors abusing authority	Bakuma Solar PV–BESS fenced compound and access roads	High	ESS4 (Community Health & Safety), ESS2 (Labor & Working Conditions); OP 4.01
Transactional exploitation under RBF scheme	Vendors/service providers conditioning access on favors	Households purchasing/financing solar home systems	Medium–High	ESS2, ESS10 (Stakeholder Engagement & Information Disclosure); OP 4.12 (grievance requirement)
Limited awareness of grievance channels	Stigma, fear of retaliation, and poor communication	Rural/peri-urban communities across 15 counties	Medium	ESS10 (Stakeholder Engagement & Information Disclosure); OP 4.12
Weak Enforcement of Codes of Conduct	Contractor/subcontractor monitoring gaps	All contractors, subcontractors, and RBF vendors	Medium	ESS2 (Labor & Working Conditions), ESS4 (Community Health & Safety); OP 4.01

The risks and mitigation measures outlined above are consistent with the World Bank ESF (ESS1, ESS2, ESS4, ESS10) and draw on lessons from the legacy OPs framework (OP 4.01, OP 4.12).

2.2 Context-Related Risks

Contextual risks in LESSAP counties extend beyond project sites. Rural communities face weak protective services, entrenched cultural norms discouraging women’s participation in technical or decision-making roles, and stigma around reporting GBV cases. In Grand Gedeh, for instance, cultural expectations continue to discourage women from technical jobs. In Bong and

Montserrado, early marriage and domestic burdens reduce female participation in training and employment opportunities.

Under Phase I, GRM records showed near-zero reporting of GBV/SEA/SH cases despite anecdotal incidents, confirming that stigma, fear of retaliation, and low awareness remain critical barriers. These contextual factors amplify vulnerabilities under new subprojects like the Bakuma Solar PV–BESS unless proactively addressed

2.3 Phase-Differentiated Risks

Consultations conducted highlight how risks vary across the project lifecycle:

- **Pre-construction:** Women are often excluded from siting and land-use discussions, creating opportunities for coercion and unequal benefit-sharing.
- **Construction:** Labor influx during health facility works, streetlight installation, and Solar PV–BESS construction elevates risks of harassment, transactional exploitation, and unsafe spaces, particularly around schools and health facilities.
- **Operation:** At electrified health facilities and under the RBF scheme, transactional risks may arise if grievance channels are not trusted. At Bakuma, ongoing security presence at the Solar PV–BESS compound introduces risks of misconduct if CoC enforcement lapses.

2.4 Strategic Response

The project adopts a survivor-centered, preventive approach, informed by Phase I lessons and consistent with the World Bank’s GRM Interim Technical Note (2020) and the ESMP.

Key measures include:

- Codes of Conduct signed by all contractors, subcontractors, RBF vendors, and security staff at Solar PV–BESS sites, with clear disciplinary pathways (warning, suspension, dismissal, referral to authorities).
- Mandatory GBV/SEA/SH training for workers, service providers, and health staff, including refresher sessions and scenario-based learning.
- Service mapping by accredited GBV NGOs, ensuring referral pathways for medical, psychosocial, legal, and protection services are accessible in all counties.
- Integration of GRM entry points with confidential, survivor-sensitive reporting and rapid referral to services.
- Community awareness campaigns, delivered jointly with MoGCSP, MoH, and local leaders, to reduce stigma, address harmful norms, and promote safe reporting.

- Monitoring and enforcement, with independent audits and third-party monitoring to ensure compliance and accountability.

These measures directly respond to documented Phase I weaknesses—low female workforce participation (<25%), weak GRM uptake on GBV cases, and inconsistent CoC enforcement—by embedding stronger accountability, targeted outreach, and dedicated oversight mechanisms in Phase II.

This approach operationalizes ESF requirements (ESS1, ESS2, ESS4, ESS10) while addressing legacy OP 4.01/4.12 obligations, ensuring continuity and progressive strengthening of safeguards.

2.2 Summary of Community Consultations and Findings

Community consultations were conducted across the project intervention areas, in line with the Stakeholder Engagement Plan (SEP) prepared under ESS10, to assess gender-related issues and identify risks of GBV/SEA/SH that may affect the success of this plan. These consultations engaged women, girls, men, and community leaders, focusing on gathering input about safety, inclusion, access to project benefits, and concerns around gender-based violence.

The consultations revealed that women and girls face barriers in accessing economic opportunities, lack representation in decision-making processes, and experience limited awareness of grievance mechanisms available to report incidents of gender-based violence. Participants highlighted concerns about labor influx during project implementation, the potential for increased gender-based violence, and the need for continuous engagement to promote gender equity and safety.

These findings are consistent with experiences and lessons learned from LESSAP 1 with persistent gaps, where similar concerns emerged, particularly regarding the lack of structured support for women in project activities and limited access to gender-responsive services. During the environmental and social screening for LESSAP 2, focused specifically on school and health center electrification, community members reiterated these issues, emphasizing the need for targeted measures to increase women's participation and ensure their protection throughout these specific interventions.

For instance, during the screening of schools and health centers under LESSAP 2, communities expressed concerns about the vulnerability of girls and women in and around these facilities, particularly with increased activities related to electrification works. Concerns were raised about the need for safe spaces, protection against potential exploitation, and the importance of including women in the management and oversight of these community assets. These concerns reflect the gaps identified during LESSAP 1 and highlight the necessity for gender-responsive planning in educational and healthcare settings.

The consultations also underscored the importance of culturally appropriate awareness campaigns, the establishment of safe reporting mechanisms, and the strengthening of local capacity to address

gender-related concerns. This feedback has informed the development of this plan to ensure that it addresses the real and perceived risks faced by women and other vulnerable groups in the project areas.

Table 1: Community Feedback and Concerns Matrix

Feedback/Concern	Project Phase	Source of Feedback	Required Response or Action
Limited awareness of GBV grievance mechanisms	Pre-Implementation	Women, Girls, Community Leaders	Establish and publicize accessible reporting channels
Barriers to economic participation for women	Throughout	Women, Youth Groups	Promote inclusive employment opportunities
Fear of labor influx increasing GBV risks	Implementation	Community at Large	Monitor labor influx and enforce GBV safeguards
Vulnerability of women around schools and health centers	Screening	Parents, School Committees	Strengthening protection measures in sensitive areas
Lack of women in decision-making roles	Planning & Execution	Women's Groups, Local Leaders	Facilitate women's participation in project oversight
Cultural sensitivity of awareness programs	Awareness Campaigns	Traditional Leaders, Elders	Develop culturally adapted education materials
Need for safe spaces for women and girls	Implementation	Girls, Women	Integrate safe spaces into project infrastructure

2.4 Cultural and Social Norms Influencing GBV

Certain cultural and social norms prevalent in the project areas influence gender roles, limit women's participation, and heighten risks of SEA/SH throughout the project lifecycle. These norms often reinforce male dominance in decision-making, restrict women's mobility, and perpetuate stigma around reporting incidents of gender-based violence.

During environmental and social screening for this project, specific examples were observed and confirmed across several counties, including:

- In Nimba and Lofa, women are often excluded from land discussions, reducing their influence in decisions concerning electrification of schools and health centers. If women are not represented in decision making forums in the community especially female heads of households, then the overall stakeholder engagement plan may not be representative of vulnerable groups.
- In Grand Gedeh, there exists a general perception that women should not participate in technical or construction-related jobs, limiting their employment opportunities in the project. While the LESSAP 2 ESCP does not establish binding employment quotas, the project will promote gender-inclusive recruitment by encouraging contractors to set participation targets for women in technical and semi-technical roles. This approach aligns with the National Gender Policy of Liberia (2009), which calls for increased women's participation in all sectors. Awareness campaigns through Local Government Authorities (LGAs), traditional leaders, and community platforms will further reduce stigma and encourage female participation.
- In Bong and Montserrado, early marriage and domestic responsibilities were cited as barriers to women's participation in training and employment under similar energy projects. To address these challenges, the project will promote partnerships with development partners (DPs), NGOs, and private sector actors to introduce alternative technological solutions that reduce women's workload—such as piped water systems, boreholes, and clean cooking stoves. These interventions aim to improve women's time availability, safety, and overall participation in project-related livelihood and empowerment activities.
- In Maryland, women expressed concern about their safety due to labor influx, especially during the construction of mini-grids and other facilities.

These situations, while drawn from specific counties, reflect a broader context shared across Liberia, where traditional gender roles and social expectations impact women's ability to engage with and benefit fully from rural electrification initiatives.

These norms influence not only the construction phase but also extend into pre-construction activities such as stakeholder consultations and land negotiations, where women's voices are often excluded. In the post-construction phase, norms continue to affect women's access to and control over the benefits of electrification, including their involvement in managing electrified community assets like schools and health centers. Therefore, continuous gender-sensitive engagement, monitoring, and support are required throughout the entire project lifecycle to mitigate risks and promote equitable participation.

Contractors and subcontractors must be sensitized to these dynamics, as their actions during pre-construction, construction, and operational phases can either exacerbate or help mitigate these

risks. Particular attention must be given to enforcing codes of conduct, monitoring labor practices, and ensuring respectful and inclusive engagement with local communities to prevent the reinforcement of harmful norms and behaviors.

Table 2.1: County-Specific Gender Issues and Their Influence on the Project

County	Gender Issues Identified	Phase Affected	Required Action
Nimba, Lofa	Exclusion of women from land discussions	Pre-construction, Construction	Promote inclusive land negotiation processes
Grand Gedeh	Perception against women in technical roles	Construction	Enforce equitable hiring and gender-sensitive work environments
Bong, Montserrado	Early marriage and domestic responsibilities limiting women's participation	All Phases	Provide flexible engagement schedules and targeted outreach
Maryland	Safety concerns due to labor influx	Construction	Monitor labor practices and ensure GBV safeguards

These examples demonstrate the pervasive influence of cultural and social norms on project outcomes and the need for comprehensive strategies to address them across all phases of implementation.

3.0 Objectives of the SEA/SH

3.1 Primary Objective

The primary objective of this plan is to ensure that all activities under the project are designed and implemented in a manner that prevents and mitigates SEA/SH risks, fosters gender equality, and promotes the full, safe, and active participation of women, girls, and other vulnerable groups. This plan aims to establish an inclusive, respectful, and secure environment throughout the pre-construction, construction, and post-construction phases, where all individuals can engage with and benefit from the project without fear of harm, discrimination, or exclusion.

This plan ensures that no individual, particularly women and girls, is subjected to any form of SEA/SH or exploitation, whether from labor influx, unequal participation, or systemic barriers rooted in social and cultural norms.

This objective directly supports the broader goal of the project to enhance rural electrification and increase access to clean, affordable, and reliable energy for health centers, schools, and communities across Liberia. Integrating gender-sensitive approaches into each aspect of the project

ensures that energy access contributes not only to economic and social development but also to the empowerment and protection of those traditionally marginalized.

In achieving this objective, the plan emphasizes:

- Strict compliance with gender-related safeguards for all stakeholders, including contractors, subcontractors, and implementing agencies.
- Continuous monitoring of gender-based risks and the effectiveness of mitigation measures throughout the project lifecycle, with clear indicators such as the number of cases reported, referrals made, and survivor-centered services accessed.
- Active engagement with local communities, ensuring that women's voices are heard in decision-making processes related to land, labor, and benefits distribution.
- Enforcement of codes of conduct, grievance mechanisms, and referral systems that protect survivors, ensure accountability, and maintain confidentiality, with explicit sanctions for contractors or worker non-compliance.
- Collaboration with key institutions such as the Ministry of Gender, Ministry of Health, Liberia National Police, and local governance structures to strengthen institutional support for gender equality and GBV prevention.
- Engagement of a qualified GBV, SEA & SH Service Provider (NGO) to conduct service mapping, maintain updated referral pathways, and deliver survivor-centered case management in line with the World Bank's GRM Interim Technical Note (April 2020).
- Integration of survivor-centered principles (safety, confidentiality, respect, non-discrimination, and informed consent) into all grievance redress and referral processes.
- Provision of safe, multi-channel GRM entry points (e.g., hotlines, female focal points, suggestion boxes, and trusted intermediaries) to ensure accessibility for women and vulnerable groups.
- A sustainability strategy to ensure institutional handover, where MoGCSP and county-level authorities continue to update service mapping and maintain referral pathways beyond project closure

Embedding these principles into the project contributes to sustainability and ensures that electrification efforts do not unintentionally reinforce existing inequalities but instead serve as a catalyst for positive social transformation.

3.2 Specific Goals and Expected Outcomes

This plan sets forth specific goals and outcomes aimed at reducing SEA/SH risks, promoting gender equality, and ensuring that women and vulnerable groups are actively engaged and

protected throughout the project lifecycle. These goals align with Liberia's National Gender Policy, the Decent Work Act, and international frameworks, including the World Bank Environmental and Social Standards.

The goals are:

- Promote a gender-sensitive approach to all project activities, ensuring that women and marginalized groups have equal opportunities to participate, benefit, and contribute to the project.
- Ensure that all contractors, subcontractors, and project staff understand and adhere to their roles in preventing gender-based violence, sexual exploitation, abuse, and harassment, supported by clear codes of conduct and regular training.
- Strengthen community-level awareness of SEA/SH risks and encourage the use of grievance mechanisms that are accessible, confidential, and responsive to survivors' needs.
- Establish monitoring systems using gender-disaggregated indicators to track progress, evaluate the effectiveness of gender-related measures, and inform adaptive strategies.
- Enhance coordination among key stakeholders, including government agencies, traditional leaders, and the grievance redress mechanism, to foster collective accountability for gender mainstreaming.

The expected outcomes of this plan include:

- Increased participation of women and marginalized groups in all phases of the project, particularly in decision-making processes and employment opportunities.
- A reduction in SEA/SH incidents linked to project activities through proactive prevention and responsive support systems.
- Improved knowledge and capacity among project actors and community members to address and report gender-based violence.
- A functional, trusted, and survivor-centered grievance redress system that ensures timely resolution of complaints and supports survivor recovery.
- Demonstrated compliance by contractors and other implementing partners with gender-sensitive policies and safeguards, monitored and enforced by RREA and the project's oversight bodies.

These goals and outcomes will be achieved through coordinated efforts, continuous monitoring, and mandatory adherence by all stakeholders, ensuring that the project fosters a safe, inclusive, and equitable environment for all.

4.0 Institutional Arrangements and Responsibilities

4.1 Roles and Responsibilities of RREA

The Rural and Renewable Energy Agency holds primary responsibility for leading the coordination, implementation, and oversight of this plan across all phases of the project. This includes ensuring that gender-sensitive strategies are fully integrated and that all implementing partners comply with the objectives outlined herein.

RREA GBV, SEA & SH Specialist/Focal Person shall:

- Ensure that gender risks and mitigation measures are systematically addressed through the entire project lifecycle, including pre-construction, construction, and operational phases.
- Lead the development of gender-responsive policies, procedures, and codes of conduct applicable to contractors, subcontractors, and other stakeholders engaged in the project.
- Conduct regular monitoring and evaluation of gender activities, utilizing tools such as compliance checklists, progress reports, and community feedback mechanisms to assess the effectiveness of the plan.
- Provide technical guidance and support to contractors and implementing partners to ensure they adopt gender-inclusive practices and adhere to the project's gender safeguards.
- Facilitate continuous training and capacity-building initiatives for project staff, contractors, and local stakeholders to enhance gender awareness and improve the implementation of gender-sensitive actions.
- Coordinate with key institutions, including the Ministry of Gender, Health, and Police, to ensure timely referrals, survivor support, and effective response to SEA/SH incidents.
- Enforce contractor compliance by establishing clear penalties for non-compliance with gender policies, including potential termination of contracts or suspension from project activities.
- Integrate feedback from communities, particularly women and marginalized groups, into the ongoing refinement of gender strategies, ensuring that the plan remains responsive to evolving gender dynamics within project areas.
- Ensure that quarterly and annual reports on gender activities are prepared, reviewed, and submitted in accordance with project requirements, capturing disaggregated data and lessons learned.

RREA shall remain accountable for the overall success of gender mainstreaming within the project and will provide leadership to ensure that all actions under this plan are executed with diligence, inclusiveness, and transparency.

4.2 Roles and Responsibilities of Contractors and Subcontractors

Contractors and subcontractors are critical to the successful implementation of this plan and are required to uphold the highest standards of gender sensitivity, ensuring that their operations do not contribute to gender inequalities or exacerbate risks of SEA/SH throughout the project lifecycle.

Contractors and subcontractors shall:

- Implement gender-sensitive labor practices, including the equitable recruitment of women for both skilled and unskilled roles, and maintain a safe, inclusive, and respectful work environment.
- Develop and enforce a Code of Conduct aligned with this plan, which explicitly prohibits all forms of gender-based violence, sexual exploitation and abuse, and sexual harassment.
- Provide regular and mandatory training to all workers on gender issues, the Code of Conduct, grievance reporting procedures, and respectful engagement with local communities.
- Monitor labor practices and ensure that workers are aware of, and comply with, gender safeguards, including the availability and accessibility of confidential grievance mechanisms.
- Report on all gender-related grievances promptly to RREA and the Grievance Redress Committee, ensuring confidentiality and timely referral to appropriate services where necessary.
- Collaborate with RREA and the SEA/SH Committee in the investigation and resolution of SEA/SH incidents, fully supporting any disciplinary actions or legal processes required.
- Facilitate the integration of gender considerations into work planning and execution, including scheduling flexibility to accommodate the participation of women and ensuring that project sites are designed and managed to minimize risks to vulnerable groups.
- Maintain gender-disaggregated data on employment, grievances, and training participation, and submit periodic reports to RREA for monitoring and evaluation purposes.
- Participate in quarterly coordination meetings on gender-related matters and contribute to continuous improvement in the management of gender risks within the project.

The obligations of contractors and subcontractors extend across pre-construction, construction, and operational phases, with a duty to ensure that their conduct, policies, and practices support the overall objectives of this plan and foster a safe, equitable project environment for all.

4.3 Formation and Roles of the GBV Committee

4.3.1 Formation of the SEA/SH Committee

The SEA/SH Committee shall be formally established under the leadership of the project's implementing agency to oversee the execution of this plan. The committee will be composed of designated representatives (GBV, SEA & SH Focal persons) from key institutions, ensuring a multi-sectoral approach to SEA/SH prevention and response.

Composition:

- PIU Social Safeguards and Gender Specialist
- Gender Assistant
- Ministry of Gender, Children and Social Protection Representative/GBV, SEAH & SH Specialist
- Liberia National Police – Women and Children Protection Section Officers who have training in GBV, SEA & SH
- Ministry of Health Officer assigned project areas
- Contractor-designated GBV Focal Point or Site Nurse

This composition ensures a balance of technical, legal, and health perspectives, promoting effective coordination in all aspects of SEA/SH risk mitigation.

4.3.2 Roles and Responsibilities of the SEA/SH Committee

- **Oversight and Coordination:** Provide overall direction and supervision for the implementation of this plan across all project areas, ensuring adherence to SEA/SH protocols at all phases.
- **Compliance Monitoring:** Monitor compliance with SEA/SH codes of conduct, grievance mechanisms, and prevention strategies by contractors, subcontractors, and all project-affiliated personnel.
- **Review and Adaptation:** Evaluate the effectiveness of SEA/SH mitigation measures, identify gaps, and recommend necessary adjustments based on monitoring data and stakeholder feedback.
- **Confidential Case Management:** Ensure all reported cases of SEA/SH are handled with strict confidentiality and survivors are referred to appropriate support services in line with survivor-centered principles.

- **Stakeholder Engagement:** Collaborate with relevant ministries, including the Ministry of Gender, Ministry of Health, and Liberia National Police, to align project-level actions with national frameworks and ensure access to external services.
- **Training and Awareness:** Facilitate regular training for committee members, contractors, and local stakeholders on SEA/SH prevention, reporting, and response.
- **Community Sensitization:** Lead community outreach and sensitization activities, raise awareness about SEA/SH risks, the grievance mechanism, and the importance of gender equality.
- **Documentation and Reporting:** Maintain accurate, anonymized records of SEA/SH cases, training sessions, and monitoring results. Provide regular reports to RREA and relevant oversight entities.

4.4 Roles and Responsibilities of Government Ministries and Local Authorities

The successful implementation of this plan requires the active engagement of relevant government ministries and local authorities. These institutions provide technical leadership, service delivery, and enforcement of legal provisions critical to SEA/SH prevention, survivor support, and gender mainstreaming in the project.

Ministry of Gender, Children and Social Protection:

- Provide policy direction and technical guidance on gender mainstreaming and SEA/SH prevention within the project.
- Ensure alignment of project activities with national gender frameworks and priorities.
- Support capacity-building efforts, including training of the SEA/SH Committee, contractors, and local actors.
- Lead the provision and oversight of survivor support services, including psychosocial care and legal referrals, in line with national standards.
- Facilitate coordination between national and county-level gender structures to support community-level engagement and outreach.
- Monitor compliance of project activities with national gender and protection laws, offering feedback and corrective actions where necessary.

Ministry of Health:

- Ensure availability and accessibility of medical and psychosocial services for survivors of SEA/SH throughout the project areas.

- Provide technical assistance in establishing and maintaining referral pathways for survivors.
- Support health-related awareness and sensitization activities linked to SEA/SH prevention, particularly in communities hosting project activities.
- Monitor the quality of medical and psychosocial services provided to survivors, ensuring adherence to national health protocols and standards.

Liberia National Police (Women and Children Protection Unit):

- Facilitate investigation of SEA/SH incidents related to the project in line with national laws.
- Provide protection services for survivors and ensure safe access to justice.
- Collaborate with the SEA/SH Committee to strengthen local-level law enforcement responses and raise awareness about legal rights and protections.
- Participate in training and sensitization programs to enhance law enforcement's capacity to handle project-related SEA/SH cases effectively.

Local Government Authorities GBV, SEA & SH Focal Persons:

- Support implementation of this plan at county and district levels, ensuring coordination among local stakeholders.
- Promote community-based awareness on gender equality, non-violence, and available grievance mechanisms under the project.
- Facilitate the integration of local traditional leadership into project gender initiatives, fostering cultural sensitivity and local ownership.
- Monitor local contractors and subcontractors for compliance with this plan and support enforcement of sanctions for non-compliance.

5.0 GBV Prevention, Mitigation, and Response Framework

5.1 Awareness Campaigns and Community Engagement

Awareness campaigns and community engagement activities are central to building understanding and promoting behavioral change among project-affected populations. These activities are designed to inform communities about SEA/SH risks, reporting channels, and available support mechanisms.

- Community dialogue forums and sensitization sessions will be regularly held in collaboration with local town chiefs, women's councils, and youth groups to ensure

culturally sensitive engagement across project sites. Informational materials will be adapted into local languages such as Kpelleh, Bassa, and Mano where necessary.

- Local leaders, including traditional authorities and women's groups, will be engaged to foster culturally sensitive outreach.
- Awareness campaigns will emphasize zero tolerance for SEA/SH and promote inclusive participation of women in project-related activities.

5.1.1 Awareness Campaigns and Community Engagement

5.1.2 Induction and Refresher Training Programs

Induction and refresher training programs ensure that all project personnel, including contractors and subcontractors, are fully aware of their responsibilities concerning SEA/SH prevention and response.

- All workers shall receive mandatory training on gender-based violence, sexual exploitation, abuse, and harassment before commencing project activities.
- Refresher training will be provided at regular intervals, with updated content reflecting lessons learned, changes in policy, or emerging risks.
- Specialized training will be provided to supervisors and managers, focusing on leadership roles in enforcing compliance and fostering a respectful workplace culture.

5.1.3 Code of Conduct (CoC) Implementation

The implementation of a Code of Conduct serves as a formal commitment by all project workers to uphold the highest standards of behavior, prohibiting any form of gender-based violence.

- Each worker shall sign the Code of Conduct as a mandatory condition of employment, with clear language outlining prohibited behaviors and consequences of violations.
- The Code of Conduct shall be displayed prominently at project sites, in languages understood by the workforce.
- Enforcement of the Code of Conduct will be monitored by the project management team, under the oversight of the PIU Safeguards Specialist, with immediate action taken against breaches in accordance with disciplinary procedures. the contractor's disciplinary procedures, under the oversight of the PIU Social Safeguards Specialist, and in line with Liberian labor law and WB ESF requirements. In cases of GBV/SEA/SH, sanctions will include dismissal and referral to law enforcement alongside survivor-centered referral support.
- The CoC applies equally to all contractor staff, subcontractors, and casual laborers.

- All workers will receive mandatory refresher training (at least quarterly) on CoC obligations, GBV/SEA/SH awareness, and survivor-centered response.
- Breaches of the CoC may be reported confidentially through the GRM, designated worker focal points, or anonymous channels, ensuring accessibility and whistleblower protection.
- Consequences of non-compliance will be explicitly stated in the CoC and enforced by the contractor in consultation with the PIU. Sanctions will include: (i) verbal/written warnings for minor breaches, (ii) suspension and mandatory retraining for moderate breaches, and (iii) dismissal, blacklisting from future contracts, and referral to law enforcement for severe breaches involving GBV/SEA/SH.
- Contractors are required to document all breaches, the corrective actions taken, and report quarterly to the PIU. These records will form part of compliance monitoring and be subject to independent audit.
- The CoC will also be disclosed to communities during engagement activities, ensuring that community members are aware of expected worker behavior and available reporting channels.
- Contract compliance will be linked to CoC enforcement, with adherence forming part of contract performance requirements. Repeated or severe violations may trigger payment withholding, non-renewal, or termination of contractor agreements.
- In cases involving GBV/SEA/SH, survivor-centered principles (safety, confidentiality, respect, non-discrimination, and informed consent) will guide both the response and referral to service providers, alongside disciplinary and legal actions against perpetrators.

5.2 Mitigation Strategies

5.2.1 Grievance Redress Mechanism (GRM)

- The GRM will handle all SEA/SH complaints confidentially, ensuring the protection and dignity of survivors.
- It will offer multiple, accessible, and anonymous reporting channels for both community members and project workers.
- GRM Operators are not authorized to investigate GBV cases. Instead, upon receiving a complaint, they will promptly refer survivors to relevant support services, including the Ministry of Gender, Ministry of Health, and Liberia National Police, strictly with the survivor's consent, and in accordance with national protocols.
- Contractors and subcontractors will establish their own GRM, which will be aligned with the project-level GRM to ensure coordination and consistent handling of GBV complaints.
- RREA and the GBV Committee will review the GRM's performance quarterly, assessing reporting timeliness, survivor satisfaction, and the resolution efficiency, while ensuring that all actions comply with legal and ethical standards.

5.2.2 Contractor Compliance Monitoring

- Contractors and subcontractors are required to demonstrate full compliance with gender-sensitive standards, including strict adherence to the Code of Conduct and the independent operation of their own Grievance Redress Mechanism, aligned with the project-level GRM.
- RREA and the GBV Committee will conduct scheduled and unscheduled inspections covering workplace behavior, labor practices, and community engagement to assess contractor adherence to this plan.
- Any identified non-compliance will result in immediate corrective actions, which may include formal warnings, contract suspension, or termination, depending on the severity and recurrence of violations.
- Contractors and subcontractors Gender, GBV, SEA & SH Specialists must submit detailed gender compliance reports monthly to RREA. These reports must include data on any GBV incidents, descriptions of training and sensitization sessions conducted, steps taken to prevent recurrence, and updates on the effectiveness of internal GBV mitigation measures.

5.2.3 Community Feedback and Safety Audits

- Community safety audits will evaluate SEA/SH risks and their impact within the project areas.
- Feedback will be actively collected from women, girls, and other vulnerable groups and will inform the ongoing mitigation strategy.
- These audits will respect cultural sensitivities and traditional leadership structures, while ensuring that women's voices are meaningfully included in the assessment process.
- Project operations will be adjusted based on community feedback to enhance safety and inclusiveness.

5.2.4 Enforcement of Employment Policies

- All project entities must enforce employment policies that explicitly prohibit gender-based violence, sexual exploitation and abuse, and sexual harassment.
- Employment contracts must include clear provisions for disciplinary measures in cases of GBV/SEA/SH violations, proportionate to the project's High/Medium risk rating under the World Bank ESF. Disciplinary actions will follow a graduated system, including:
 - Verbal or written warning for minor misconduct.
 - Suspension without pay and mandatory retraining for moderate breaches.
 - Immediate dismissal, blacklisting from all future project contracts, and referral to law enforcement authorities for severe breaches involving GBV/SEA/SH.

- All confirmed GBV/SEA/SH cases will trigger survivor-centered referral procedures to ensure safety, confidentiality, and access to appropriate support services.
- These policies will align with the Liberian Decent Work Act of 2015, providing a legal foundation for labor protections and disciplinary actions.
- Gender-disaggregated data will be maintained to track the involvement of women and men in project activities and promote equal participation.

5.3 Response Protocols

5.3.1 GBV Incident Reporting and Documentation

- All GBV/SEA/SH incidents must be reported through the Grievance Redress Mechanism (GRM) using safe, confidential, and accessible channels.
- The GRM Operator shall acknowledge all GBV complaints within 24 hours of receipt, initiating the documentation process immediately.
- Only anonymized and essential details will be recorded, consistent with survivor consent and national legal requirements, and all documentation, referrals, and case handling will be done with the survivor's informed consent, in line with survivor-centered principles (safety, confidentiality, respect, non-discrimination, and informed choice).
- Community focal people, including trained traditional leaders or designated local representatives, may assist survivors in accessing the GRM and reporting channels where culturally appropriate.
- Multiple safe reporting channels (e.g., hotlines, women focal points, anonymous submissions, and GRM operators) will be made available to ensure accessibility for women and vulnerable groups.
- An Accountability and Response Framework will be applied, specifying clear responsibilities and timelines for the PIU, contractors, service providers, and the GBV Committee in handling reports, with escalation pathways to the World Bank TTL if cases are mishandled or unresolved.
-

5.3.2 Survivor Support and Referral Pathways

- Upon receipt of a GBV complaint, the GRM Operator will coordinate with the GBV Committee to ensure immediate referral of the survivor to appropriate services, including medical care, psychosocial support, legal assistance, and protection services.

- Referrals to medical or psychosocial services shall be made immediately (within hours of reporting), recognizing the critical time-sensitivity of care such as PEP and clinical management of rape (within 72 hours).
- Referral pathways will include services provided by the Ministry of Gender, Ministry of Health, and Liberia National Police, in line with national protocols.
- Survivors will be informed of all available support options and retain full control over which services they wish to access.
- Contractors and subcontractors are required to facilitate immediate access to these services for any survivor within their workforce and ensure no retaliation or discrimination occurs.
- A qualified GBV Service Provider (NGO) will maintain updated service mapping and oversee survivor-centered referrals, in line with the World Bank's GRM Interim Technical Note (April 2020).

5.3.3 Investigation and Disciplinary Measures

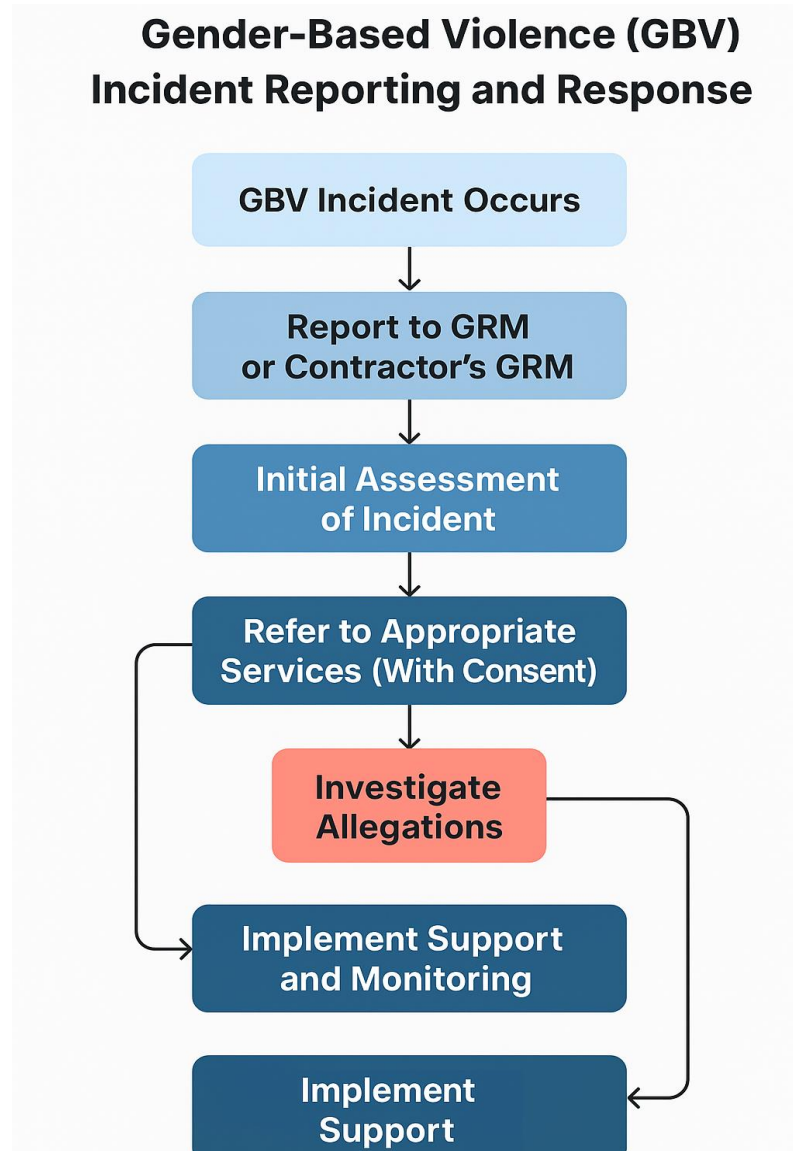
- The GBV Committee, in collaboration with RREA and relevant authorities, will initiate an investigation within 48 hours of receiving a survivor's consent.
- All investigations will aim to conclude within 14 days, depending on the complexity of the case, and survivor safety will be prioritized throughout the process.
- Employers of the alleged perpetrator, whether contractor or subcontractor, are responsible for cooperating fully with the investigation and enforcing disciplinary measures as outlined in the Code of Conduct.
- Disciplinary measures may include suspension, termination, or referral to legal authorities, in alignment with the Liberian Decent Work Act of 2015 and national criminal laws.
- Contractual enforcement measures will also apply repeated or systemic breaches of the CoC may trigger financial penalties, payment withholding, or termination of contractor agreements.
- Outcomes of investigations (sanctions, corrective actions, and referrals) will be documented by the PIU and reported quarterly in aggregated, anonymized form to the World Bank and the Ministry of Gender, ensuring accountability and oversight.

This chart visually represents the structured process for handling GBV, SEA, or SH incidents within the project, ensuring clarity of roles, survivor-centered responses, and compliance with legal frameworks:

Step-by-Step Breakdown of the Flowchart:

1. Incident Occurrence:

- A GBV, SEA, or SH incident is experienced or observed within the project context, involving community members, workers, or contractors.



2. Confidential Reporting via GRM:

- The survivor or witness reports the incident through the Grievance Redress Mechanism (GRM) operated by RREA or the contractor's dedicated GRM.
- Reporting can be anonymous and must prioritize the survivor's consent.

3. Immediate Referral by GRM Operator:

- The GRM Operator does not investigate but refers the case based on the survivor's consent to the GBV Committee for coordination.
- If the survivor requests support, they are referred to appropriate medical, psychosocial, or legal services.

4. **Service Provision:**

- **Ministry of Health:** Provides medical care.
- **Ministry of Gender:** Offers psychosocial and legal support.
- **Liberia National Police (WCPU):** Handles legal processes where applicable, especially for non-bailable offenses like rape.

5. **Confidential Documentation:**

- Minimal, anonymized details are recorded to track the complaint and ensure support provision.
- No identifying information is shared without explicit consent.

6. **Internal Oversight:**

- The GBV Committee monitors the progression of the case, ensuring timely referral and survivor-centered care.
- If the case involves a contractor or subcontractor, the Contractor's GRM must coordinate with RREA's GRM for reporting and compliance purposes.

7. **Disciplinary Actions:**

- For project-related perpetrators, disciplinary action is taken based on the Code of Conduct, independent of criminal proceedings.
- The **employer** is responsible for enacting workplace-related sanctions.

8. **Legal Action:**

- In cases involving criminal offenses (e.g., rape), the matter is referred to the Liberia National Police and legal proceedings follow national law.

9. **Case Closure:**

- A case is only closed when:
 - The survivor no longer requires support.
 - Legal or disciplinary actions are completed.
 - The survivor decides not to pursue further action.

10. Feedback and Learning:

- Survivors receive updates at all stages.
- Lessons from the case inform GRM reviews and project improvements.

5.3.4 Feedback and Continuous Improvement

- Survivors will receive continuous feedback on the status and outcome of their complaint at key stages: upon receipt, during investigation, and after resolution.
- The GBV Committee will regularly review case handling procedures and gather feedback from survivors and community stakeholders to improve the effectiveness and sensitivity of response protocols.
- Adjustments to reporting, referral, and investigation processes will be made as necessary to strengthen survivor trust and ensure accountability.

5.3.5 Contractor Grievance Redress Mechanism (GRM)

Each contractor and subcontractor engaged in the project shall establish and maintain a separate Grievance Redress Mechanism to address concerns related to labor, working conditions, and GBV/SEA/SH within their specific operations. While these GRMs function independently from the central project GRM, they are subject to oversight by RREA and the GBV Committee to ensure alignment with this plan and project-wide standards.

Contractor GRMs is required to:

- Provide confidential, accessible, and safe channels for workers and community members to report GBV-related concerns.
- Refer all GBV cases to the project-level GBV Committee or appropriate external service providers, subject to the survivor's informed consent. These GRMs are not authorized to investigate any allegations of GBV, SEA, or SH, consistent with national law.
- Submit monthly anonymized summaries of GBV-related complaints, referrals, and actions taken to RREA and the GBV Committee for monitoring and compliance purposes.
- Ensure that all GRM operators are trained in GBV-sensitive reporting and referral protocols, as outlined under the project's training strategy, to ensure consistent and survivor-centered responses across all components.

RREA and the GBV Committee will conduct periodic reviews of contractor GRM performance, ensuring adherence to agreed standards and providing additional support or corrective measures where necessary.

6.0 Monitoring, Evaluation, and Reporting

6.1 Monitoring Indicators

Monitoring gender-based violence-related activities will be continuous throughout the project lifecycle. Indicators will assess the effectiveness of prevention, mitigation, and response efforts and ensure accountability.

Key Indicators Include:

- Number of GBV/SEA/SH training sessions conducted for project staff, contractors, subcontractors, and community members, with a minimum of four sessions per county per year (including induction and at least one annual refresher), ensuring 100% coverage of all workers.
- Percentage of workers who have signed and completed training on the Code of Conduct, with a target of 100% coverage for direct employees and at least 90% for subcontractor and casual workers (Phase I baseline: 82%).
- Number of GBV/SEA/SH cases reported, disaggregated by age, sex, and type of incident, with a target of 100% of cases logged and reviewed, with Phase II aiming to improve completeness and consistency of anonymized records.
- Number and percentage of survivors referred to appropriate support services, with a target of 100% being offered referral and at least 80% uptake within 72 hours of reporting (Phase I uptake: ~65%).
- Frequency and outcomes of grievance redress mechanism reviews, GRM performance will be reviewed quarterly by the PIU and Safeguards Team to assess case resolution timelines, referral quality, and community satisfaction. All corrective actions will be implemented within 30 days of each review cycle, and findings will be documented in quarterly E&S compliance reports to ensure accountability and continuous improvement. Gender-disaggregated data on employment and participation in consultations, with a target of at least 30% female participation in consultations (up from the 22% Phase I baseline) and at least 20% of semi-skilled jobs filled by women. Data will also be further disaggregated by age and vulnerability categories, including youth, persons with disabilities, and female-headed households.
- Community feedback on project safety and inclusion, measured through annual surveys, with a target of at least 70% of women and 60% of youth reporting improved safety and inclusion compared to Phase I baselines of approximately 47% (women) and 42% (youth).

- Number of contractor compliance inspections conducted and outcomes of corrective actions. (minimum of 2 per contractor per quarter, with $\geq 95\%$ of non-compliances closed within 60 days; unresolved issues linked to payment milestones or contract penalties).
- Number of updates made to this plan based on monitoring results. target: at least 1 formal update annually, consistent with ESCP requirements).

6.2 Evaluation Schedule

- **Quarterly Evaluations:** Led by RREA, in collaboration with the GBV Committee, to assess progress, integrate feedback, and implement adjustments where needed.
- **Annual Reviews:** Comprehensive review of GBV/SEA/SH activities, documented outcomes, and recommended improvements for the subsequent year.
- **Mid-Term and End-of-Project Assessments:** Evaluate the overall impact of GBV/SEA/SH measures, ensuring lessons learned inform future project implementation.

6.3 Reporting Responsibilities

- **RREA:** Compiles data from all implementing partners, submits quarterly and annual reports to the World Bank, and ensures follow-up on any gaps identified.
- **Contractors/Subcontractors:** Submit gender compliance and incident reports monthly, by the 5th of each month, including training data, reported incidents, and mitigation actions taken.
- **GBV Committee:** Provides oversight summaries on grievance mechanism performance, survivor support outcomes, and identifies areas for improvement.
- **GRM Operator:** Maintains up-to-date records of complaints, referral outcomes, and survivor feedback, ensuring data confidentiality and accuracy.
- **Ministry of Gender, Health, and Liberia National Police:** Collaborate with RREA to ensure timely submission of referral outcomes and support service effectiveness data.
- **Feedback Integration:** Feedback from survivors and community consultations will be documented and used to update mitigation strategies on a rolling basis.

6.4 Continuous Monitoring and Adaptive Management

The implementation of this plan will follow an adaptive management approach, ensuring that GBV/SEA/SH risks are continuously monitored, and strategies remain responsive and effective throughout the project lifecycle. Continuous improvement will be guided by monitoring outcomes, survivor feedback, and practical lessons gained from project activities.

Key Mechanisms for Adaptive Management:

- **Real-Time Adjustments:** RREA, together with the GBV Committee, will make timely adjustments to this plan based on quarterly monitoring, shifts in community dynamics, or emerging risks observed in project areas.
- **Gender-Specific Feedback Loops:** Feedback from women, girls, and other vulnerable groups will be systematically gathered through safe, confidential consultations, enabling responsive changes to awareness programs, training modules, and engagement practices.
- **Lessons Learned Integration:** Experiences from similar projects, including LESSAP Phase I, will be integrated into ongoing project activities to ensure that successful approaches are sustained and scaled where appropriate.
- **Targeted Capacity Strengthening:** Based on evaluation results, RREA will facilitate additional training or technical support for staff, contractors, subcontractors, and implement partners to close any capacity gaps in GBV prevention and response.

Review and Update Schedule:

- **Quarterly Reviews:** Focused updates to address immediate risks, feedback, or monitoring outcomes, overseen by the GBV Committee.
- **Annual Revisions:** Comprehensive updates based on an annual evaluation of project data, feedback, and GBV risk trends.
- **Post-Project Assessment:** Final review to document the impact, identify success factors, and highlight recommendations for future projects.
- Certainly! Here's **Table 6.1: Adaptive Management Mechanisms** manually formatted for you:

Table 6.1: Adaptive Management Mechanisms

Area of Focus	Monitoring Method	Frequency	Responsible Party	Action Based on Findings
Effectiveness of Awareness Campaigns	Feedback from community consultations	Quarterly	RREA, GBV Committee	Adjust messaging, increase reach or frequency
Contractor Compliance with CoC	Review of monthly compliance reports, site inspections	Monthly	RREA, GBV Committee	Enforce corrective actions, retrain staff, suspend contracts
Survivor Satisfaction	Anonymous surveys, GRM	Bi-Annually	RREA, Ministry of Health,	Improve referral processes,

with Support Services	feedback channels		Ministry of Gender	enhance survivor support
Community Safety and GBV Risks	Community safety audits, feedback from women's groups	Quarterly	RREA, Local Government	Mitigation strategies, engage traditional leaders
GRM Functionality	Review of case referrals, reporting timelines	Quarterly	GRM Operators, GBV Committee	Enhance reporting mechanisms, increase operator training
Participation of Women in Project Benefits	Gender-disaggregated data analysis	Quarterly	RREA, Contractors	Modify engagement approaches, ensure equitable access

7.0 National and International Legal Framework

7.1 Relevant National Laws and Policies

The implementation of this plan aligns with key national legal instruments that address gender equality, labor rights, and protection against gender-based violence. These laws form the basis for compliance and accountability mechanisms throughout the project lifecycle, ensuring that all stakeholders, including contractors, subcontractors, and community members, are protected and empowered.

7.1.1 Constitution of Liberia

The Constitution of Liberia (1986) guarantees the fundamental rights and freedoms of all Liberians, including the right to equality before the law and protection from discrimination.

- **Article 11(c):** Ensures all people are equal before the law and entitled to equal protection.
- **Article 18:** Prohibits discrimination in employment based on sex or other status.
Project Alignment: All project-related employment practices, including recruitment and labor engagement, must uphold these constitutional protections. RREA and contractors must ensure gender equality in all employment and community engagement processes under this plan.

7.1.2 Domestic Violence Act (2019)

Under the Domestic Violence Act (2019), survivors of abuse — particularly women and children in rural areas — are legally entitled to protection services, though access remains limited in some

counties such as Rivercess and Gbarpolu. The project will actively link survivors to the Ministry of Gender's One-Stop Centers were operational.

Project Alignment: The plan integrates this Act by ensuring that survivors of GBV/SEA/SH within project areas have access to support services and legal redress. The GBV Committee coordinates with the Ministry of Gender to uphold the provisions of this law.

7.1.3 Revised Rape Law (2021)

This law This law also outlines the particular vulnerability of children, defining all sexual acts involving minors under 18 as statutory rape. In alignment with the World Bank GRM Interim Technical Note (2020), all cases involving children are subject to mandatory reporting to the Liberia National Police–WACPS, regardless of consent. While the GRM cannot investigate such cases, it ensures immediate, confidential referral to competent authorities and accredited child protection service providers, while upholding survivor-centered principles to the greatest extent possible.

Project Alignment: All GBV-related complaints involving rape are immediately referred, with survivor consent, to the Liberia National Police. The GRM, while not authorized to investigate, ensures prompt referral to competent authorities. Contractors and workers found in violation are subject to legal prosecution.

7.1.4 Decent Work Act (2015)

This Act establishes legal standards for fair treatment in the workplace, including non-discrimination, equal pay, and protection from harassment and abuse.

Project Alignment: Contractors and subcontractors are mandated to align employment contracts and workplace policies with this Act. Codes of Conduct enforced under this plan reflect these legal obligations. Monthly compliance reports submitted to RREA verify adherence.

7.1.5 Gender Equality Act (2021)

The Act promotes equal opportunities for all genders across sectors and mandates the elimination of gender-based discrimination.

Project Alignment: Gender-sensitive hiring, participation in decision-making, and access to project benefits are ensured through policies and practices guided by this Act. The GBV Committee, with support from the Ministry of Gender, ensures its enforcement throughout the project.



7.1.6 Enforcement Clarity Across the Project

- **Ministry of Gender, Children and Social Protection:** Monitors adherence to gender equality laws, provides technical support, and ensures survivor protection.
- **Liberia National Police – Women and Children Protection Section:** Responsible for the legal handling of GBV-related offenses, particularly those involving criminal conduct.
- **RREA:** Oversees compliance with all legal frameworks within project operations and ensures alignment with national laws through contractor engagement and reporting.
- **Third Party Monitor (TPM):** Provides independent oversight of GBV/SEA/SH risk mitigation measures, verifies contractor compliance with CoC and GRM protocols, and conducts community-based monitoring to ensure survivor-centered services and grievance channels are functioning as intended. TPM findings are reported directly to the PIU and the World Bank, ensuring external accountability.

7.2 International Standards and Commitments

The project is aligned with several international conventions and frameworks that reinforce gender equality, prevent gender-based violence, and uphold labor rights. These instruments support national laws and affirm the commitment to protect women, girls, and other vulnerable groups at every stage of the project.

7.2.1 Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

Liberia ratified CEDAW in 1984, committing to the elimination of all forms of discrimination against women, and ensuring equal participation in political, economic, social, and cultural life.

Project Alignment: This plan operationalizes CEDAW through actions that promote women's equal involvement in project activities, including employment, decision-making, and access to benefits, and by reducing structural barriers to women's empowerment within the project environment.

7.2.2 International Labor Organization (ILO) Convention No. 190 – Violence and Harassment (2019)

ILO 190 provides a global standard for preventing violence and harassment, including gender-based violence, within workplaces. It promotes a safe and respectful environment for all.

Project Alignment: All employment practices, including those of contractors and subcontractors, adhere to ILO 190 by strictly enforcing Codes of Conduct, implementing clear sanctions for violations, and providing access to safe and confidential grievance mechanisms.

7.2.3 United Nations Sustainable Development Goals (SDGs)

- **SDG 5:** Achieve gender equality and empower all women and girls.
- **SDG 8:** Promote sustained, inclusive economic growth, full and productive employment, and decent work for all.

Project Alignment: The project contributes to SDG 5 by actively integrating gender equality measures in rural electrification, employment, and decision-making. SDG 8 is advanced through fair labor standards, promotion of decent work, and protection of workers from gender-based violence.

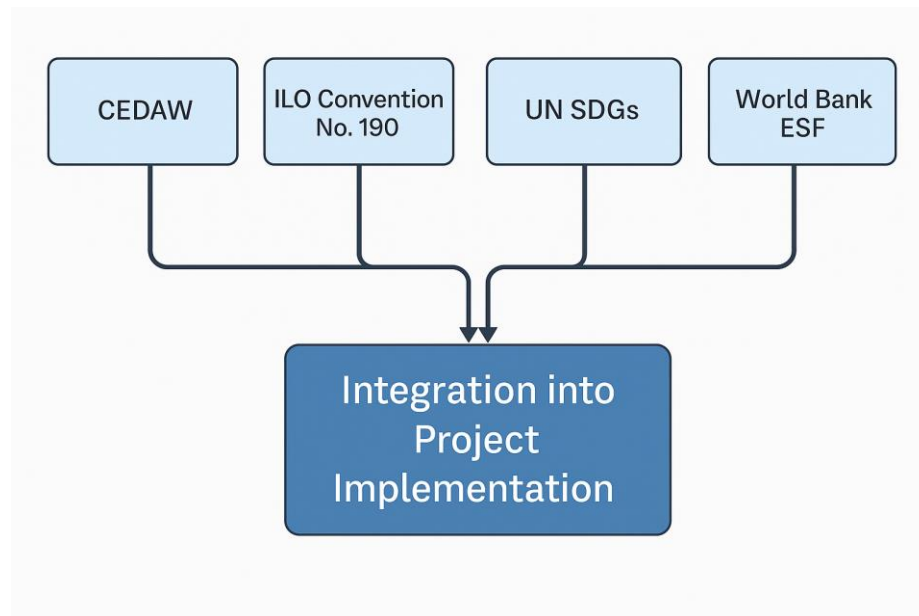
7.2.4 World Bank Environmental and Social Framework (ESF)

- **ESS 1:** Assessment and Management of Environmental and Social Risks and Impacts.
- **ESS 2:** Labor and Working Conditions.
- **ESS 4:** Community Health and Safety.

- **ESS 10:** Stakeholder Engagement and Information Disclosure

Project Alignment: Gender risks are systematically assessed and managed under ESS 1. Contractors are required to maintain labor practices that comply with ESS 2, including the prevention of gender-based violence. ESS 4 guides community-level safeguards to ensure the health, safety, and protection of women and vulnerable groups.

7.2 5 Integration into Project Implementation



- All contractors, subcontractors, and project partners are obligated to comply with these international standards.
- The GBV Committee ensures continuous monitoring of adherence to both national and international legal frameworks.
- Training and awareness initiatives under this plan incorporate these international standards, ensuring that all actors are informed of their rights, obligations, and the protective measures embedded within the project.

8.0 Training and Capacity Building

The success of this plan depends heavily on the capacity of all project actors to understand, prevent, and respond to GBV/SEA/SH risks. Training and capacity-building efforts will ensure that knowledge, attitudes, and practices related to gender equality, survivor-centered response, and legal obligations are consistently applied across the project lifecycle.

8.1 Training Strategy and Methodology

The training strategy aims to deliver targeted, continuous, and participatory learning for project staff, contractors, subcontractors, community leaders, and local authorities.

- **Initial Induction Sessions:** All staff, including contractors and subcontractors, must undergo induction training on GBV, SEA, SH, and the Code of Conduct before commencement of project activities.
- **Quarterly Refresher Trainings:** Regular updates will reinforce understanding and adaptation to emerging gender-related risks or changes in operational contexts.
- **Community Sensitization Campaigns:** Culturally appropriate outreach sessions will engage local communities, emphasizing the importance of reporting mechanisms and survivor support.
- **Participatory Approach:** Training will be interactive, involving role-plays, case studies, and feedback sessions to enhance retention and relevance.

Key Principles:

- Survivor-centered
- Culturally respectful
- Legally compliant with national and international frameworks

8.2 Roles in Training and Awareness

- **RREA:** Responsible for developing training materials, coordinating sessions, and monitoring participation across all project levels.
- **GBV Committee:** Supports RREA in content delivery, with special focus on survivor-centered approaches and legal compliance.
- **Contractors/Subcontractors:** Ensure all their employees receive the required training and adhere to the standards established under this plan.
- **Ministry of Gender, Health, and Liberia National Police:** Provide technical input, legal clarity, and specialized sessions on response protocols.

8.3 Sample Training Agenda

Time	Topic	Facilitator
09:00 – 09:30	Introduction to Gender-Based Violence	RREA Social Safeguard Specialist

09:30 – 10:00	Overview of GBV Risks in the Project Context	GBV Committee Representative
10:00 – 10:30	National and International Legal Frameworks	Ministry of Gender
10:30 – 11:00	Break	-
11:00 – 12:00	Contractor Obligations and Code of Conduct (CoC)	Contractor GBV Officer
12:00 – 12:30	Grievance Redress Mechanism (GRM) Procedures	RREA GRM Officer
12:30 – 13:00	Case Studies and Practical Scenarios	Liberia National Police – WACPS Unit
13:00 – 13:30	Closing Remarks and Feedback Collection	RREA/GBV Committee

8.4 Training Budget Allocation

Activity	Revised Estimated Cost (USD)
Development of Training Materials (15 counties)	\$5,000.00
Induction Training Sessions (Initial Roll-out)	\$10,000.00
Quarterly Refresher Trainings (county-based)	\$9,000.00
Community Sensitization Campaigns (media, town halls, translations)	\$12,500.00
Specialized Training with Gender, Health, and Police (regional hubs)	\$5,000.00
Monitoring and Evaluation of Training Effectiveness	\$4,300.00
Third-Party Monitor (NGO) – independent oversight and reporting	\$20,000.00
Support for Community Focal Points (transport, stipends, phones)	\$6,000.00
PIU GBV/SEA & SH Specialist field support (missions, logistics)	\$5,000.00
Legal Aid and Case Management Support for survivors	\$7,000.00
Sustainability and Exit Workshops (regional rollouts)	\$3,500.00
Total	\$87,300.00

9.0 Gender Action Plan Implementation Oversight

9.1 Oversight Framework

The implementation of this Gender Action Plan (GAP) will be reinforced through continuous oversight to ensure that GBV/SEA/SH(GBV) prevention, mitigation, and response measures are

consistently applied across all project activities. The Rural and Renewable Energy Agency (RREA), in collaboration with the GBV/SEA/SH(GBV) Committee, will lead coordination efforts to ensure that all implementing partners maintain compliance with the commitments outlined in this plan.

Oversight will focus on:

- Ensuring alignment of field activities with the GAP's gender objectives.
- Reinforcing institutional accountability across RREA, contractors, subcontractors, and service providers.
- Strengthening partnerships with the Ministry of Gender, Children and Social Protection, the Ministry of Health, and the Liberia National Police for survivor support and referral services.
- Promoting adaptive management based on feedback, lessons learned, and evolving project realities.

9.2 Compliance Assurance

All contractors, subcontractors, and project-affiliated personnel are required to adhere to the GAP's Code of Conduct and gender-sensitive policies. Compliance will be enforced through:

- Ongoing supervision and contractor engagement.
- Integration of gender considerations into site management, community relations, and worker interactions.
- Immediate corrective actions where breaches of gender safeguards or GBV protocols are identified.

9.3 Stakeholder Roles and Coordination

Key actors will continue to play active roles in maintaining a safe and inclusive project environment:

- **RREA:** Leads overall coordination, oversight, and engagement with implementing partners to promote continuous improvement.
- **GBV Committee:** Provides technical guidance and ensures that survivor-centered approaches are upheld in all referrals and actions.
- **Contractors and Subcontractors:** Maintain internal accountability systems, support GBV prevention measures, and promptly refer cases through the established Grievance Redress Mechanism (GRM).

- **GRM Operators:** Facilitate access to survivor services and maintain confidentiality in the handling of GBV-related complaints.

Through strong coordination and adaptive oversight, LESSAP Phase II will maintain its commitment to gender equality, community safety, and survivor protection throughout the project lifecycle.

9.5 Reporting Responsibilities and Data Management

9.5.1 Reporting Responsibilities

- **RREA:**
 - Consolidates data from contractors, the GBV Committee, GRM Operators, and other actors.
 - Submits quarterly progress reports on gender actions to the World Bank, Ministry of Gender, Ministry of Health, and other partners.
 - Leads annual reviews of the plan's implementation, integrating stakeholder feedback for future actions.
- **GBV Committee:**
 - Validates GBV-related data for accuracy and completeness.
 - Reviews monthly contractor reports on gender compliance and provides feedback.
 - Recommend corrective measures when non-compliance is identified.
- **Contractors and Subcontractors:**
 - Submit monthly gender compliance reports detailing:
 - Training records.
 - Incident data.
 - Grievance outcomes.
 - Report any non-compliance cases and actions taken to resolve them.
- **GRM Operators:**
 - Maintain anonymized records of all gender-based complaints.
 - Submit monthly summaries to RREA and the GBV Committee.
 - Ensure survivors are referred promptly and follow up to confirm the receipt of services.

9.5.2 Data Confidentiality and Protection

- All personal data related to GBV survivors will be anonymized and handled under strict confidentiality protocols.
- Data sharing will occur only with survivor consent or when legally mandated, as outlined under Liberia's national laws.
- The GRM will ensure secure storage of records, and RREA will oversee compliance with data protection standards.

Table: Reporting Responsibilities Summary

Responsible Party	Reporting Task	Frequency
RREA	Consolidate data, submit quarterly/annual reports	Quarterly/Annually
GBV Committee	Validate data, review compliance, recommend actions	Monthly
Contractors/Subcontractors	Submit gender compliance reports, report non-compliance	Monthly
GRM Operators	Maintain complaint records, submit summaries, ensure referrals	Monthly

10.0 Annexes

The following annexes provide supporting documents and templates referenced in this Action Plan.

List of Annexes

Annex 1: Individual Code of Conduct on GBV, SEA/SH, and Child Protection

Annex 2: Contractor/Worker Code of Conduct

Annex 3: GBV, SEA & SH Referral Pathway and Service Mapping Template

Annex 4: Grievance Redress Mechanism (GRM) Reporting Form for GBV/SEA/SH Cases

Annex 5: Training Attendance and Compliance Monitoring Template

Annex 6: Sample Awareness and Sensitization Materials (flyers/posters)

Annex 1: Individual Code of Conduct on GBV, SEA, and Child Protection

1. Purpose and Scope

This Code of Conduct establishes the behavioral standards expected of all personnel engaged under the Liberia Electricity Sector Strengthening and Access Project (LESSAP-2), including PIU staff, consultants, contractors, and subcontractors. It seeks to prevent and respond to all forms of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and child protection violations in accordance with the World Bank Environmental and Social Framework (ESF), the Liberia Decent Work Act (2015), the Revised Rape Law (2021), and the National GBV Referral Mechanism (2020). Adherence to this Code is a binding condition of employment or engagement under the Project.

2 Legal and Policy Compliance

All personnel shall comply with the laws of Liberia and with international standards reflected in the World Bank ESF. Each staff member must respect the principles of equality, non-discrimination, and accountability set forth in the SEA/SH Good Practice Note (3rd Edition), the Liberia National Gender Policy, and the ARREST Agenda (2024–2029). The Project's Gender Action Plan and GBV/SEA & SH Action Plan shall guide implementation of this Code throughout the project life cycle.

3. Expected Behavior and Prohibited

- All personnel should treat every individual with dignity and respect and avoid any conduct that may cause physical, emotional, or psychological harm. Sexual activity with people under eighteen (18) years of age is strictly prohibited, and ignorance of age will not be accepted as an excuse. Staff should not offer money, employment, goods, or services in exchange for sexual favors, nor engage in relationships that exploit unequal power dynamics. Use of demeaning or culturally offensive language, physical violence, threats, or intimidation of any kind is prohibited. Sharing or circulating sexually explicit or exploitative material through social-media or electronic platforms is forbidden. Staff shall abstain from consuming alcohol or drugs during working hours and from any behavior that could endanger community members or colleagues.

4. Obligations and Responsibilities

Everyone is responsible for upholding this Code and reporting any suspected or confirmed violation immediately through the established confidential channels. All staff are required to participate in induction and refresher training on GBV, SEA, SH, and child protection. Supervisors and managers should ensure that their teams understand and comply with this Code and will be held accountable for failure to act on, concealment of, or retaliation related to reported incidents.

Contractors and partner organizations must also ensure that all employees, including temporary and casual laborers, sign and comply with the Code prior to deployment.

5. Reporting Violations

Incidents or concerns may be reported anonymously or directly to supervisors, the PIU Safeguards Unit, or through the Project's Grievance Redress Mechanism (GRM). All GBV/SEA/SH-related grievances shall be managed through the confidential SEA/SH channel within the GRM, consistent with the World Bank GRM Interim Technical Note (2020). Survivor safety, privacy, and consent shall guide every step of case management. Survivors shall be referred to the nearest One-Stop Center or accredited GBV Service Provider Network for medical, psychosocial, and legal assistance. Retaliation against any person reporting in good faith is strictly prohibited and will result in disciplinary action.

6. Awareness, Gender Inclusion and Capacity Building

All project staff shall attend mandatory induction and quarterly refresher training sessions on GBV, SEA, and child protection. The Project shall collaborate with county-level authorities, women's organizations, and NGOs to raise community awareness of GBV/SEA/SH risks and safe reporting pathways. While specific employment quotas for women were not established under LESSAP-1, the PIU will promote women's participation in both technical and non-technical roles, guided by national gender policy and previous project experience, to ensure greater gender balance and inclusion.

7. Consequences of Breach

Any violation of this Code constitutes gross misconduct. Sanctions include verbal or written warning, suspension or dismissal, termination of contract, and referral to competent authorities for legal action. Supervisors who fail to address or conceal violations shall face equivalent sanctions. Repeated or serious breaches may lead to permanent exclusion from World Bank-supported projects.

8. Acknowledgment

I acknowledge that I have read, understood, and agreed to comply fully with the provisions of this Code of Conduct. I understand that adherence is a condition of my employment or engagement and that any violation may result in disciplinary or legal action.

Signed: _____ Date: _____

Supervisor: _____ Date: _____

Annex 2: Contractor/Worker CoC on GBV, SEA/SH, and Child Protection

1. Purpose and Applicability

This Code of Conduct applies to all contractors, subcontractors, and workers engaged under the Liberia Electricity Sector Strengthening and Access Project (LESSAP-2).

Its purpose is to ensure that all project workers act responsibly and respectfully toward colleagues and community members, preventing all forms of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and child protection violations.

2. Legal and Policy Obligations

All workers shall comply with the laws of Liberia, including the Revised Rape Law (2021) and the Decent Work Act (2015). They must also adhere to the World Bank Environmental and Social Framework (ESF), the LESSAP-2 GBV/SEA & SH Action Plan, and this Code. Sexual activity with any person under eighteen (18) years of age is strictly prohibited; claiming ignorance of age shall not be accepted as an excuse. All workers must conduct themselves in ways that respect national values and community dignity.

3. Prohibited Conduct

While employed under this Project, I shall never:

- Engage in any form of GBV, SEA, SH, or child abuse.
- Offer money, employment, goods, or services in exchange for sex or favors.
- Engage in sexual or romantic relationships with community members while on duty or residing near the project site.
- Use abusive, threatening, or discriminatory language or gestures.
- Commit or attempt acts of physical violence or intimidation.
- Consume alcohol or drugs during working hours or behave in a way that endangers others.
- Share or circulate sexually explicit or exploitative content through social media or electronic devices.
- Ignore, hide, or fail to report any act of GBV, SEA, or SH committed by myself or others.

4. Worker Responsibilities

I shall treat all people—especially women, children, and persons with disabilities—with dignity and respect.

I will attend all mandatory inductions and refresher training courses on GBV, SEA/SH, and child protection.

I will immediately report any suspected or actual violation of this Code to my supervisor, the GRM focal person, or a GBV Committee member.

I will respect community boundaries, avoid exploitative interactions, and support survivors by maintaining confidentiality and referring them through safe reporting channels.

5. Reporting, Referral, and Whistleblower Protection

Reports may be made confidentially or anonymously through the Project's Grievance Redress Mechanism (GRM), a supervisor, or a community focal point.

All reports will be treated with confidentiality, guided by survivor consent and safety.

Survivors will be referred to accredited GBV service providers and One-Stop Centers identified in Annex 5 – GBV Service Provider Mapping and Referral Pathway, following the survivor-centered approach and national confidentiality protocols.

No worker will face punishment or loss of employment for reporting a violation in good faith.

Cases involving children will be mandatorily reported to the Liberia National Police and the Ministry of Gender, Children and Social Protection for legal and protective action.

6. Consequences of Violation

Any violation of this Code constitutes serious misconduct and may result in:

- Verbal or written warning.
- Suspension or immediate termination of employment or contract.
- Payment of restitution to cover survivor support costs when applicable.
- Permanent ban from working on World Bank–financed projects in Liberia; or
- Referral to national authorities for criminal prosecution.

7. Contractor and Supervisor Duties

Contractors and supervisors are responsible for enforcing this Code among all workers and subcontractors.

They must ensure that every worker receives, understands, and signs this Code prior to mobilization.

Supervisors who ignore or conceal violations will face the same sanctions as the perpetrator.

Contractors shall maintain attendance records for all GBV/SEA/SH and child-protection trainings, signed by participants and verified by the PIU Safeguards Unit during routine site inspections.

Monthly compliance reports shall be submitted to the PIU, including training attendance, awareness sessions, and any incident follow-up actions.

8. Positive Conduct and Gender Inclusion

All workers are encouraged to model respectful behavior and promote gender equality in interactions with colleagues and communities.

Workers shall actively support the participation of women and youth in safe project employment

opportunities and community engagement activities.

Demonstrating courtesy, teamwork, and respect for local norms shall be recognized as part of good performance under this Project.

9. Worker Acknowledgment and Renewal

I, _____, acknowledge that I have read—or had this Code explained to me—and fully understand its contents.

I agree to follow all rules and obligations contained herein and understand that any breach constitutes misconduct that may result in dismissal or legal action.

For contracts extending beyond one year, I agree to re-sign this Code annually or upon contract renewal to reaffirm my commitment to its principles.

Worker Name: _____ **Signature / Thumbprint:** _____ **Date:** _____

Supervisor / Employer Name: _____ **Signature:** _____ **Date:** _____

Annex 3: Existing GBV Service Providers and Referral Pathways

GBV Service Centers in Liberia – County by County (Refined)

County	Service Centers	Location	Contact Number	Notes
Montserrado	James N. Davis Memorial Hospital (One-Stop)	Paynesville, Neezoe	0776776441	Open daily 8am–5pm
	Redemption Hospital (One-Stop)	New Kru Town	0776776441	Open daily 8am–5pm
	Hope for Women One-Stop Center	Paynesville, A.B Tolbert	0776776441	Private center, open daily
	Duport Road Health Center (One-Stop)	Paynesville, Duport Road	0776776441	Open daily 8am–4pm
	Safe Homes (3 Total, NGO-managed)	Monrovia	Through MoGCSP	Locations confidential, access via Ministry of Gender
	WACPS Headquarters	Capitol Hill, Monrovia	0770800123 / 0770800124	Primary police GBV referral
	Ministry of Gender Office	Capitol Bye-Pass, Monrovia	0886588881 / 0770361727	
Bong	Phebe Hospital (One-Stop)	Suakoko	Ministry of Gender Bong	Not open on weekends, 8am–4pm
	C.B. Dunbar Hospital (One-Stop)	Gbarnga	Ministry of Gender Bong	Not open on weekends, 8am–4pm
	Safe Home (Limited Operation)	Gbarnga	Through MoGCSP	Minimal resources, not consistently open
	WACPS	Gbarnga	0886567809	

Nimba	G.W. Harley Memorial Hospital	Sanniquellie	Ministry of Gender Nimba	
	Jackson F. Doe Memorial Hospital	Tappita	0776566703	
	Safe Home	Sanniquellie	Through MoGCSP	Limited capacity
	WACPS	Sanniquellie	0886627462	
Grand Bassa	Buchanan Government Hospital (One-Stop)	Buchanan	0886793553	Not open on weekends, 8am–4pm
	Safe Home	Buchanan	Through MoGCSP	
	WACPS	Buchanan	0886839899	
Bomi	Liberia Government Hospital (One-Stop)	Tubmanburg	Ministry of Gender Bomi	
	WACPS	Tubmanburg	0886576231	
Margibi	C.H. Rennie Hospital (One-Stop)	Kakata	0886547189	
	Safe Home (Limited Operation)	Kakata	Through MoGCSP	Currently low capacity due to funding
	WACPS	Kakata	0886850537	
Grand Gedeh	Martha Tubman Hospital (One-Stop)	Zwedru	0886552161	
	Safe Home (Currently Non-Operational)	Zwedru	Through MoGCSP	In need of renovation

	WACPS	Zwedru	0886546336	
Rivercess	Episcopal Church Relief & Development (Shelter)	Cestos City	WACPS Rivercess	
	WACPS	Cestos City	0886743600	
Lofa	Curran Lutheran Hospital	Zorzor	0886532159	
	Safe Home (Limited Operation)	Voinjama	Through MoGCSP	
	WACPS	Voinjama	0886706120	
Grand Cape Mount	Sinje Health Center	Sinje	WACPS Robertsport	
	Safe Home	Robertsport	Through MoGCSP	
	WACPS	Robertsport	0886630708	
Gbarpolu	Emirates Hospital	Bopolu	WACPS Bopolu	
	WACPS	Bopolu	0886812350	
Grand Kru	Rally Time Hospital	Grand Cess	WACPS Barclayville	
	WACPS	Barclayville	0886731923	
River Gee	Fish Town Hospital (One-Stop)	Fish Town	0886827441	
	Safe Home (Currently Non-Operational)	Fish Town	Through MoGCSP	Burglarized and non-functional
	WACPS	Fish Town	0886735812	
Maryland	James Jenkins Dossen Hospital	Harper	0886857444	

	WACPS	Harper	0886577312	
Sinoe	F.J. Grant Memorial Hospital (One-Stop)	Greenville	0886849314	
	Safe Home (Restore Hope – Non-Operational)	Greenville	Through MoGCSP	
	WACPS	Greenville	0886563102	

Additional Notes:

- Safe Homes access is strictly controlled for safety; survivors are referred by WACPS or MoGCSP.
- National Coordination: Contact WACPS Headquarters or MoGCSP Monrovia for inter-county cases or emergencies.
- Some centers are not open on weekends; emergency referrals go through hospital emergency rooms or police.
- General Referral Contact (used broadly): 0776776441.

Annex 4: Sample Training Program Agenda

This sample agenda outlines the key topics and activities for GBV, SEA, and Child Protection training sessions for all project personnel, contractors, and community stakeholders.

Session Title	Objectives	Duration
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1. Introduction to GBV, SEA, and Child Protection	Define key terms and explain the importance of addressing GBV, SEA, and protecting children.	30 mins
2. Overview of Relevant National Laws	Provide an overview of Liberia's legal framework including the Decent Work Act and Revised Rape Law.	45 mins
3. International Standards and Project Policies	Discuss World Bank ESF, ILO Conventions, and project-specific policies.	45 mins
4. Code of Conduct (CoC) Overview	Explain the CoC obligations, prohibited behaviors, and disciplinary measures.	30 mins
5. Reporting Mechanisms and GRM Access	Describe how to report violations confidentially and the role of the GRM.	30 mins
6. Survivor-Centered Approaches	Train in handling disclosures respectfully and ensuring survivor protection and consent.	30 mins
7. Roles and Responsibilities	Clarify roles of staff, supervisors, contractors, and community leaders in GBV prevention.	30 mins
8. Community Engagement Strategies	Outline methods for engaging local communities and raising awareness.	30 mins
9. Interactive Case Studies and Role-Plays	Provide practical scenarios to reinforce learning and test responses.	60 mins
10. Monitoring and Reporting Requirements	Explain data collection, compliance monitoring, and reporting protocols.	30 mins
11. Gender Roles and Power Dynamics in Rural Communities	Explore how cultural norms and traditional roles influence GBV risks and responses.	30 mins
12. Pre- and Post-Training Evaluation	Assess participant knowledge before and after training to measure effectiveness.	30 mins

Note: Training sessions will be conducted during project induction and refreshed quarterly. Attendance will be tracked to ensure full participation. Follow-up evaluations will be implemented to assess the impact of the training and identify areas for improvement

Annex 5: GRM Reporting Form for GBV / SEA / SH Cases

Project Name: _____

Reporting Tool: GBV / SEA / SH Incident Report Form

Date of Report: ____ / ____ / ____

County / Location: _____

GRM Case No.: _____

1. Reporter / Complainant Details (optional or anonymous option available)

Field	Response
Name (or “Anonymous”)	_____
Sex (Male / Female / Other)	_____
Age / Date of Birth	_____
Contact (phone / address)	_____
Preferred Language	_____
Relationship with Project (worker, community member, contractor, etc.)	_____

2. Incident Description & Context

Field	Response
Date of Incident	____ / ____ / ____
Time of Incident	____ : ____
Location / Site / Facility	_____
Type of Incident (<i>tick all that apply</i>)	☐ Sexual Harassment ☐ Sexual Exploitation ☐ Sexual Abuse ☐ Rape ☐ Other (specify) _____
Description of What Happened (<i>in brief, objective terms</i>)	_____ _____
Known or suspected perpetrator(s)	_____
Witnesses (if any)	_____

3. Survivor / Affected Party Preferences & Consent

Field	Response
Does the survivor consent to use of this form / record?	☐ Yes ☐ No
Preferred mode of follow-up / communication	_____
Does survivor consent to referral to services?	☐ Yes ☐ No

Any reason NOT to refer? (e.g. safety concern)	_____
--	-------

4. Referral & Support Provided

Service Type	Referral Made? (Y/N)	Date	Service Provider / Location	Notes
Medical Care	☐ / ☐	___ / ___ / ___	_____	
Psychosocial Counseling	☐ / ☐	___ / ___ / ___	_____	
Legal Assistance	☐ / ☐	___ / ___ / ___	_____	
Protection / Shelter / Safe Accommodation	☐ / ☐	___ / ___ / ___	_____	

5. GRM Actions Taken & Timeline

Step	Responsible Party	Date Initiated	Status / Outcome	Notes
Case Received / Logged	GRM Operator	___ / ___ / ___	☐ Open ☐ Closed	
Acknowledgment Provided to Reporter	GRM Operator	___ / ___ / ___	☐ Done ☐ Pending	
Referred to GBV Committee / Service Provider	GRM Operator	___ / ___ / ___	☐ Done ☐ Pending	
Investigation Initiated	GBV Committee / PIU / Authorities	___ / ___ / ___	☐ Done ☐ In Progress	
Disciplinary / Legal Action Taken	Contractor / Employer / Authorities	___ / ___ / ___	☐ Done ☐ Pending	
Case Closed	PIU / GBV Committee	___ / ___ / ___	☐ Yes ☐ No	
Feedback Provided to Survivor (as agreed)	GRM / GBV Committee	___ / ___ / ___	☐ Yes ☐ No	

6. Confidentiality & Signature

- This form is **confidential**. Information is kept anonymized and shared only with those responsible for referrals, investigation, and resolution, in line with survivor consent and national law.
- **Reporter / Survivor Signature (if agreeable):** _____ Date: ____ / ____ / ____
- **GRM Operator / Receiver of Report:** _____ Date: _____ / _____ / _____

Annex 6: Sample Awareness and Sensitization Materials (Flyers/Posters)

These materials are designed for use in LESSAP project communities across Liberia. They should be translated into local languages and use pictorials/icons for audiences with low literacy. Posters should display the logos of RREA, World Bank, MoGCSP, MoH, and LNP-WACPS to reinforce trust.

Flyer / Poster Sample 1: “Zero Tolerance to GBV/SEA/SH”

Headline:

 ZERO TOLERANCE to Gender-Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment!

Body Text:

- All workers and contractors on this project must follow the Code of Conduct.
- No worker, supervisor, or community leader has the right to demand sex, favors, or gifts in exchange for jobs, services, or opportunities.
- Survivors will be referred to free and confidential services, including medical care, psychosocial support, legal aid, and protection services.

Reporting Channels:

- Report incidents safely through the Grievance Redress Mechanism (GRM).
- Contact your Community Focal Point or GRM Office.
- Hotline: _____

Visuals:

-  Respect
-  Equality
-  No Harassment
-  No Exploitation

Flyer / Poster Sample 2: “Your Rights in the Project”**Headline:**

Know Your Rights – Be Protected!

Messages:

- Women and men have equal rights to employment, training, and participation in project activities.
- Children are protected by law – mistake of age is not an excuse.
- Reports of GBV/SEA/SH are handled confidentially and without retaliation.

Steps if you experience or witness abuse:

1. Tell a trusted Community Focal Person or use the GRM box.

2. Call the GRM Hotline or speak with your GRM Operator.
3. Access survivor support services: hospital/clinic, MoGCSP counselor, LNP-WACPS officer, or NGO partner.

Visuals:

- Women and men working together safely.
- Diagram of reporting pathway: Survivor → GRM → GBV Committee → Services.

Flyer / Poster Sample 3: “Safe Communities, Safe Worksites”

Headline:

Together We Create Safe Communities

Key Messages:

- Respect women, children, and vulnerable persons.
- Protect colleagues and neighbors from violence and exploitation.
- Uphold dignity at home, at work, and in the community.

Remember:

- Sexual activity with anyone under 18 is illegal.
- Alcohol and drugs are prohibited on project sites.
- Anyone who breaks the Code of Conduct will face disciplinary action, termination, blacklisting from World Bank projects, and referral to the police.

Positive Commitment:

- This project promotes women’s participation in technical jobs and decision-making.
- Communities are encouraged to support gender equality and inclusion in all project activities.

Implementation Notes:

- Translate into local languages and use images/icons for clarity.
- Display in schools, health facilities, community halls, marketplaces, and project sites.
- Adapt into radio spots with the same messages.
- Ensure all materials are updated with hotline numbers and referral service contacts before distribution.

Annex 7. Pictorial of Key Events



