

SELECT
SEA/SH Prevention & Response Action Plan
&
Accountability & Response Mechanism

Legend

CGRC	Central Grievance Redressal Committee
CC	Construction Contractor
CPU	Child Protection Unit
DGRC	District Grievance Redressal Committee
D&S	Design & Supervision
GBV	Gender-Based Violence
GRM	Grievance Redressal Mechanism
GRCC	Grievance Redressal Committee-Cell
GT	Guide Teacher
HT	Head Teacher
LSU	Local Support Unit
PMIU	Project Management and Implementation Unit
SC	Subject Coordinator
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SMC	School Management Committee
SM	Social Mobilization
VAC	Violence Against Children
WDC	Women Development Cell

S #	Activities to Address GBV/SEA/SH/VAC/ Risk	Output Indicators	Timeline	Responsibility	Budgetary Allocations
1. GRM & GBV, SEA/SH and VAC Complaints					
a.	Ensure GBV, SEA/ SH and VAC response mechanisms and protocols are embedded within the main GRM. The GRM should be able to take complaints from any source, and handle them as per the Protocols mentioned in the GRM, with utmost confidentiality.	<ul style="list-style-type: none"> No. of sensitive complaints received and resolved 	Before execution of Civil Work of C2	Gender Specialist PMIU, Focal Persons GR Cell, DGRC & CGRC	Not Required
b.	Mandatory reporting of detected cases of GBV, SEA/SH and VAC to the GRM via SMCs, headteachers, female teachers, CLOs and other relevant stakeholders. Involve them to report cases with complete confidentiality, privacy, and safety.	<ul style="list-style-type: none"> No. of GBV, SEA/SH & VAC complains received and resolved 	During lifecycle of the Project	Gender Specialist PMIU, Focal Persons GR Cell, DGRC & CGRC	Not required
c.	DGRCs to nominate trained female officials of WDC & CPU as gender focal persons, to be actively involved in handling GBV, SEA/SH & VAC complaints, maintaining follow-up and getting feedback from project sites.	<ul style="list-style-type: none"> No. of female nominated & trained as Gender Focal Persons 	Before execution of Civil Work of C2	Gender Specialist PMIU, Focal Person DGRC	Not Required
d.	Ensure establishment of Sexual Harassment Inquiry Committees as per the requirement of Protection Against Harassment of Women at the Workplace Act (2010) (amended 2022) at PMIU, the Allied Institutions and District Education Offices. <ul style="list-style-type: none"> Nominate three trained office bearers as permanent Committee members, including at least one woman. These office bearers will be trained by Sindh Ombudsperson Office. Requiring CoC signing with Allied Institutions and District Education Offices. 	<ul style="list-style-type: none"> No. of Sexual Harassment Inquiry Committees notified No. of CoC signed by the employees 	August, 2024	Gender Specialist PMIU, Focal Person DGRC/CGRC, Sindh Ombudsperson Office	Not Required
e.	Ensure confidentiality and privacy of victim during intake of complaints regarding SEA/SH, GBV, VAC within the project dashboard. DGRC focal person will		During lifecycle of Project	Gender Specialist, PMIU, Focal person DGRC	Not Required

	register complaint in the system, and only the gender specialist will have access to this system.				
f.	Provide digital data security & safety trainings to District GRM staff and implementing partners. Ensure all digital complaints data from communities and students is kept confidential.	<ul style="list-style-type: none"> No. of bi-annual trainings conducted after GRM has been set up 	During lifecycle of project	Gender Specialist PMIU, GRM dashboard manager PMIU, GRM focal persons	C3
g.	Mapping of GBV service providers in the project districts to devise a referral pathway for case management of SEA/SH and VAC complaints.	<ul style="list-style-type: none"> No of service providers identified for referral 	Before execution of civil work	Gender Specialist PMIU & GBV Consultant	C4
2. Sensitize and train implementing staff, including PMIU, D&S, CCs, SMPs, TPV, labor on GBV, SEA/SH, VAC, and GRM					
a.	<p>Hiring of a qualified GBV, SEA/SH trainer to impart gender sensitisation and GBV trainings.</p> <ul style="list-style-type: none"> Develop training plan to conduct trainings. Develop stand-alone training materials to orient GRM response teams as well as gender focal persons on GBV, SEA/SH, VAC laws, and GRM reporting mechanisms. Firm to also input into CDP training materials and sessions for SMCs and communities. Assist with identifying relevant local partners with expertise for subject-specific trainings on the social determinants of girl child school enrolment, retention and drop out. 	<ul style="list-style-type: none"> GBV, SEA/SH trainer hired Training plan formulated Training materials developed 	2 trainings in the first year, and six-monthly trainings second year onwards	Gender Specialist PMIU, Leadership Firm	C3
b.	<p>Initiate training sessions on gender sensitization and GBV trainings with a focus on detection and responses to cases of GBV, SEA/SH and VAC to be delivered by the Leadership Firm.</p> <ul style="list-style-type: none"> Conduct ToT (training of trainers) of PMIU, Allied Institutions education managers, EDOs, other education managers, headmasters, teachers, GTs, MTs and SCs. Teachers should be trained on awareness of SEA/SH, GBV, VAC issues, and they should 	<ul style="list-style-type: none"> No. of project related staff trained No. of labourer and contractors trained 	Ongoing in the project Lifecycle starting July 2024 till June 2025	Gender Specialist PMIU, Leadership Firm	C3

	be aware of mechanisms to connect the survivor to the DGRC focal person.				
c.	PMIU to train contractor on gender sensitisation and GBV trainings, including forms on GBV, reporting procedures and how to ensure safe working conditions for everyone.	<ul style="list-style-type: none"> No. of contractors trained 	Ongoing in the project Lifecycle starting July 2024 till June 2025	Gender Specialist PMIU, GBV Consultant, D&S firm	
d.	Contractor to conduct training on GBV, SEA/SH and VAC for labour, contractors, subcontractors, E&S and managerial staff of contractors, and any third-party firm before execution of civil-work.	<ul style="list-style-type: none"> No. of labourers, subcontractors, third-party firm workers trained 	Ongoing in the project Lifecycle starting July 2024 till June 2025	Gender Specialist PMIU, GBV Consultant, Contractor, D&S firm	
e.	<p>Train DGRC focal persons for handling GBV, SEA/SH & VAC complains on the following:</p> <ol style="list-style-type: none"> Guiding principles & ethical guidelines of taking GBV/SEA/SH/VAC complaints, and survivor-centred approaches Forms of GBV (including SEA, SH, and VAC), related laws & legal procedures, reporting mechanisms (including referral information on essential services), and available services Steps in taking GBV, SEA/SH, VAC complaints, including risk management and safety planning. Digital data security & safety and maintaining privacy and confidentiality. Taking consent at different steps of case management and referral. 	<ul style="list-style-type: none"> No. of DGRC focal persons trained for handling GBV, SEA/SH & VAC complains 	Before execution of Civil Work of C2	Gender Specialist PMIU, Design and Supervision Firm, Contractor	C2
3. Ensuring safe environment at all project sites					

a.	<p>Mandate visible display of Anti Sexual Harassment Code of Conduct by all partners at all project sites (including education offices, schools, teachers training institutes, etc.), along with information on the GRM and the GRC Focal Person's contact.</p> <ul style="list-style-type: none"> • Signage should include information on GBV, SEA/SH, VAC, HT and its prevention on the project site that signal to workers and the community that the project site is an area where GBV is prohibited. • Have all display material translated in Urdu and Sindhi. 	<ul style="list-style-type: none"> • No. of sites where GRM signage and CoC displayed 	Before Execution of Components' Activities	Gender Specialist PMIU, Focal Person GRC, DGRC & CGRC	C2, C4
b.	<p>SOPs for sexual harassment complaint must be physically displayed in all schools, in age-appropriate and accessible language/signage.</p> <ul style="list-style-type: none"> • Posters on GRC Committee and different redressal mechanisms to be displayed. • Have all display material translated in Urdu and Sindhi. 	<ul style="list-style-type: none"> • No. of schools where SOPs and complaint box displayed 	Before Execution of Components' Activities	Gender Specialist PMIU, Focal Persons DGRC & CGRC	C2
4. CoCs					
a.	<p>Signing of Code of Conduct by PMIU, Allied Institutions, DEOs and other relevant department staff.</p>	<ul style="list-style-type: none"> • No. of departments and staff signed CoC 	Before Execution of Project Activities	Gender Specialist PMIU and Head of PMIU, Allied Institutions, DEOs & other relevant departments.	C4
b.	<p>Require workers to sign Code of Conduct governing labour conduct during civil works.</p> <ul style="list-style-type: none"> • Translate the CoC into Urdu and Sindhi. • Have it signed by all workers, contractors, subcontractors, implementing partners, and third-party firms at sub-project sites. 	<ul style="list-style-type: none"> • No. of orientation sessions for CoC conducted • No. of workers who signed CoC 	Before Execution of C2 Activities	Gender Specialist PMIU, Design and Supervision Firm, Contractor	C2
c.	<p>Require contractor to provide mandatory and training to workers on SEA/SH, HIV/AIDS prevention and on</p>	<ul style="list-style-type: none"> • No. of orientation sessions conducted 		Gender Specialist PMIU, Design	C2

	the content and obligations derived from the code of conduct and other social & environmental safeguards.			and Supervision Firm, Contractor	
5. Minimizing the Risk of GBV, SEA/SH & VAC throughout Project lifecycle					
a.	Encourage contractors to minimise use of outside labour, and encourage hiring of local labour to avoid labour influx which increases the chances of GBV, SEA/SH and VAC	<ul style="list-style-type: none"> No. of local labor hired as percentage of total labour 	During Execution of Civil Work	Gender Specialist PMIU, Lead Project Engineer, Design and Supervision Firm, Contractor, Social Safeguard Specialist PMIU	C2
b.	<p>Inclusion of safe WASH facilities in the design phase of construction (location of separate female toilets in well-lit areas, boundary walls etc), newly constructed schools, PMIU & Allied Institutions for all females in the project (teachers, students, instructors).</p> <ul style="list-style-type: none"> Lessons learnt from school safety note will be incorporated. 		During Execution of Civil Work	Gender Specialist PMIU, Lead Project Engineer, Design and Supervision Firm, Contractor, Social Safeguard Specialist PMIU	C2