

The Lebanese Republic
Presidency of Council of Ministers

Emergency Crisis and Covid-19 Response
Social Safety Net Project (P173367)

Sexual Exploitation and Abuse / Sexual
Harassment

Prevention and Response Action Plan

June 3, 2022

ABBREVIATIONS AND ACRONYMS

CBO	Community Based Organization
CDC	Community Development Center
CERC	Contingent Emergency Response Component
CIO	Central Inspection Office
CMU	Central Management Unit
CoC	Code of Conducts
CSO	Civil Society Organization
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESI	Environmental and Social Instruments
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
ESSN	Lebanon Emergency Crisis and COVID19 Response Social Safety Net Project
EU	European Union
FX	Foreign Exchange
GBV	Gender-Based Violence
GBVIMS	Gender-Based Violence Information Management System
GOL	Government of Lebanon
GM	Grievance Mechanism
GPN	Good Practice Note
IEC	Information Education and Communication
IGO	Intergovernmental Organization
IMPACT	Inter-Ministerial and Municipal Platform for Assessment Coordination and Tracking
MoSA	Ministry of Social Affairs
MoPH	Ministry of Public Health
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organization
PCM	Presidency of the Council of Ministers
PIU	Project Implementations Unit
PMU	Project Management Unit
SDC	Social Development Centers
SEA	Sexual Exploitation and Abuse
SGBV	Sexual and Gender Based Violence
SH	Sexual Harassment
SSN	Social Safety Net
TOR	Terms of Reference
TPM	Third Party Monitoring
VAC	Violence Against Children

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1. Introduction

The Lebanon Emergency Crisis and COVID19 Response Social Safety Net Project (ESSN) aims to (a) provide cash transfers and access to social services to extreme poor and vulnerable Lebanese populations affected by the economic and COVID-19 crises in Lebanon; and (b) in case of an Eligible Crisis or Emergency, provide immediate and effective response to such emergency or crisis. The main components of the project will be:

Component 1: Provision of Cash Transfer for Basic Income Support

The objective of this cash transfer is to help arrest the increase in extreme poverty by providing cash transfer to 112,000 Lebanese households, scaling up from the current 15,000 households who receive an e-card food voucher. The scale-up would result in an enhanced coverage of Lebanon's targeted Social Safety Net (SSN) from 1.5 percent at present to 4.5 percent with donor assistance and up to around 24 percent of the Lebanese national population with the ESSN.

Component 2: Provision of Cash Transfer for Students-at-Risk

The objective of this component is to preserve the human capital of poor Lebanese households by supporting the retention of students who are at risk of dropping out of school due to socio-economic reasons, which may also be aggravated by school closure due to COVID-19.

Component 3: Provision of Social Services

The main purpose of this component is to (i) contribute to strengthening the capacity and systems of the Ministry of Social Affairs (MOSA) and the Social Development Centers (SDCs), and (ii) increase access to quality social services, for the vulnerable and disadvantaged households. SDCs are a key entry point where vulnerable groups seek assistance and basic 'prevention' services and where social workers assess their needs, provide them with specialized services when available, and refer them to specialized support services not available at the SDCs and/or MOSA which are typically provided by contracted NGOs or UN agencies. The package of services will therefore be designed to meet the needs that range from preventative to response services, some of which will be implemented by the SDC themselves and others through contracted specialized agencies.

Component 4: Enhanced Social Safety Nets Program Delivery

The objective of this component is to ensure an efficient and effective implementation of the ESSN program and lay the foundations for a sustainable SSN delivery, including the building blocks of a National Social Registry. To achieve this objective, the component will support the financing of:

- Development of a robust Grievance Mechanism (GM), and Communication and Outreach
- Monitoring and Evaluation (M&E), Verification System, TPM/ External Technical Audit
- Building blocks of a National Social Registry
- Project Management and Implementation Support

Component 5: Contingent Emergency Response Component (CERC)

In recognition of Lebanon's current significant vulnerability to shocks, a Contingent Emergency Response Component (CERC) with no funds is included. This component will allow the Government of Lebanon to request the World Bank for rapid reallocation of the Project funds to respond promptly and effectively to an eligible emergency or crisis that is a natural or manmade disaster or crisis that has caused or is likely to imminently cause a major adverse economic and/or social impact. If the World Bank agrees with the determination of the disaster and associated response needs, this component will draw resources from the categories financing Components 1, 2, 3, and 4 and/or allow the Government to request the World Bank to re-categorize and reallocate financing from other project components to cover emergency response and recovery costs.

2. Contextual Sexual Exploitation and Abuse and Sexual Harassment Risks

Gender-based violence (GBV) is a global issue that affects 1 in 3 women in their lifetime. Incidents of GBV, specifically sexual exploitation and abuse / sexual harassment (SEA/SH) have occurred in projects financed by the World Bank therefore a prevention and response action plan to deal with the SEA/SH risks is necessary. While women and girls tend to be most at risk, men and boys can also be at risk of SEA/SH.

In most contexts around the world, when the level of external stresses increases, a rise in violence against women is seen. Lebanon is no different. The escalation of GBV in Lebanon is alarming, with a surge in the number of cases reported formally and informally. Gender-based violence reports are emerging from Lebanese households, public spaces and workplaces, with the economic crisis and the COVID-19 pandemic contributing to increasing vulnerability and therefore exposure to risk. Sexual and gender-based violence is one of the major concerns affecting Lebanese households, with women being the targets in 90 percent of reported incidents¹. Women at risk of gender-based violence, sexual exploitation and abuse and sexual harassment and/or domestic abuse in the poorest households could experience a range of psychological and social consequences and require specialized interventions including counseling and referral to remedial services. An assessment carried out on impacts of COVID-19 by the Inter-Agency Sexual and Gender Based Violence (SGBV) Task Force in Lebanon has shown that 54 percent of women and girls reported a rise in SGBV incidents in the community or household². Similarly, the Gender-Based Violence Information Management System (GBVIMS) reported an increase in several forms of GBV during the first quarter of 2020 compared to the same period months of 2019³, with cyberbullying (187 percent increase) and economic violence (53 percent self-reported by women and girls) emerging as new types of GBV. This highlights the need to increase access to specialized services.

¹ Lebanon Crisis Response Plan 2017-2020. <https://reliefweb.int/sites/reliefweb.int/files/resources/74641.pdf>
Refer to KAFA website: <https://kafa.org.lb/en/campaigns>

² Inter-Agency SGBV Task Force Lebanon. Impact of COVID-19 on the SGBV Situation in Lebanon. <https://reliefweb.int/sites/reliefweb.int/files/resources/76729.pdf>

³GBVIMS (2020)

All communities in Lebanon are suffering, and concerned stakeholders, including public sector offices, legal bodies and employers are not properly equipped to deal with the growing number of GBV cases. Indeed, even before the crises hit, little legal recourse existed to provide legislative protections. At work, for example, very limited legal recourse was available to protect employees against sexual harassment. The lack of anti-sexual harassment policies and associated reporting mechanisms to ensure the required victim and witness protections is hindering progress towards safe and equitable workplaces.

It is worth noting that in December 2020, the Lebanese Parliament passed a landmark law against sexual harassment in December 2020 called Law #205⁴. The World Bank supported the passing of this law by working through its Mashreq Gender Facility with the National Commission for Lebanese Women (NCLW) and other stakeholders. The Anti-Sexual Harassment Law No. 205, does not limit the protections against sexual harassment to just the workplace, but also covers harassment in “any place.” The law also takes into consideration the dynamics of power and authority in social relations and provides varying degrees of punishment based on the crime and the perpetrator’s status. For example, should the perpetrator have a position of dominance or authority over the victim, a heavier punishment applies, the penalty increases, and incidents do not have to be recurrent. Moreover, heavier penalties have been imposed, as per the Law, related to cases where the perpetrator is a supervisor or a public officer, if the perpetrator abused of their right or if the victim is a minor or has special needs. In the last case, the offence becomes a felony and is no longer considered as a misdemeanor. With the passing of the law, perpetrators could spend up to four years in prison and pay hefty fines (up to 50 times the minimum wage), if they violate the sexual harassment law. Furthermore, the law does not exclude the possibility of disciplinary sanctions that the perpetrator may face at work and guarantees the victim’s right to claim compensation for the moral damages incurred. Protection of the victim and of witnesses are also protected under the law, from any discrimination they might face in the workplace.

The passing of Law No. 205 is an encouraging first step to protect the Lebanese community and in specific, employees, from being subject to sexual harassment and gender-based violence. However, without the enforcement of the law within public and private institutions, as well as clear and safe reporting mechanisms, perpetrators will continue to subject innocent victims to abuse, and victims may continue to suffer in silence. The law criminalizes SH and creates a special fund at the MoSA for the rehabilitation of the victims. In addition to pressing criminal charges, employers and organizations can now impose disciplinary measures, and victims of sexual harassment can seek additional compensation for damages caused.

3. Project SEA and SH Risks

A GBV screening tool developed by the World Bank permits to assess the risk of GBV, particularly SEA, and can be found online⁵. This SEA/SH Risk Assessment Tool helps Task Teams understand the issues

⁴ Law No. 205 (Arabic) [Link](#)

⁵ <https://worldbankgroup.sharepoint.com/sites/gsg/SPS/Pages/FocusAreas/GenderBased%20Violence.aspx>

and risks of SEA/SH in the project areas. It takes into consideration both project-specific details, such as labor influx levels, as well as the country context where the project takes place. The results of the GBV screening tool indicated that various aspects of the program bring the GBV risk to a “moderate” risk rating.

In a SSN program such as the ESSN, there are risks of both SEA/SH perpetrated by project actors, as well as GBV in general at community and household levels. Such SSN projects create changes in the communities in which they operate and can cause shifts in gendered power dynamics between community members and within households. Abusive behavior can occur not only between project staff and those living in and around the project site, but also within the homes of those affected by the project. As with any abuse of power, risks arise if program actors have decision-making power over a beneficiary (for instance power to decide who is eligible for a benefit) and can use this power during interactions with the beneficiary with little or no oversight. While many of the systems in place to select beneficiaries and distribute benefits are automated or otherwise quite structured, activities that involve a differential of power between project staff and vulnerable women/girl beneficiaries do pose a risk of SEA/SH. Consultations with women and girls have so far been limited, but, when they are carried out, will provide more insight into the context and nature of these potential risks, as well as further ideas to increase the safety of women/girls and ensure their equal access to project benefits. Potential SEA/SH risks might also occur due to the high vulnerability of beneficiaries compounded by poverty and, for many, displacement or refugee status- and thus the high need to access the project benefits.

These risks can be reduced through measures to promote a respectful and safe workplace through Codes of Conduct (CoC) and training. The ESSN program limit the actual power of program actors over beneficiaries by basing eligibility on objective criteria or centralized systems. Residual risks can be mitigated through a robust and effective grievance mechanism in place throughout the project and able to receive and resolve GBV/SEA/SH related issues by referral pathways.

4. Capacity Assessment of the implementing agency

Over the last few years, there have been numerous donors funded initiatives⁶ which provide technical assistance to MOSA and the SDCs, and who contract the services of NGOs and UN agencies to provide primary and secondary social services for vulnerable groups. Despite such efforts⁷, the sustainability of the systems, capacity built and the ability of MoSA to manage, coordinate and oversee the provision of

⁶ The EU as a donor has been funding several projects (implemented by several UN agencies and NGOs) which support social services, especially for women and children at risk, while the Italian cooperation has been supporting MOSA carry out the geo-localization and other systems building initiative

⁷ See link to the World Bank assessment, which found that the distribution of SDCs is not proportional to the national spread of poverty. Furthermore, across the country SDCs experience varying levels of performance, resource endowments and appropriately trained staff. SDC budgets were diverted towards medical services and away from family care, psychosocial support and childcare. In 2012, MoSA prioritized capacitation of SDCs and expanding funding to meet demand from displaced Syrians.

<http://documents1.worldbank.org/curated/en/925271468089385165/pdf/810980LB0box379831B00P14754500PUBLIC0.pdf>

social services that adhere to a minimum set of performance standards needs strengthening. There are multiple modalities of social service provision across a range of actors, weak coordination between different stakeholders, inability to retain social workers due to poor incentives and working conditions. There is also a need to establish and mainstream clearly defined minimum performance standards and additional operating procedures (including for referrals and inter-ministerial linkages), quality measures, and improve human resource capacity and presence of social workers⁸ at SDCs.

There are currently approximately 460 social workers working in 220 SDCs across the country. Program staff indicated that only 170 of them have qualified as social workers as many of them were hired to fill out questionnaires and enter data. Some of them were also recruited due to their political connections. About 70% of the social workers are women as fewer men are interested in social work as a profession. In some circumstances, in insecure regions, remote areas or traditional communities, for example, male social workers or female social workers accompanied by male social workers are necessary. In other circumstance, with female-headed households, for example, it is advisable to have a female social worker. This also reduces the risk of gender-based violence.

Therefore, the third component of the project recommends continuing to support MoSA's SDCs to deliver services to those at vulnerable and at risk.

5. Risk Management Systems (status/proposed interventions)

To manage and limit SEA/SH risks related to the ESSN the Central Management Unit (CMU) at the PCM prepared a GBV/SEA/SH Action Plan (See section 5 below) in line with the World Bank's Good Practice Note (GPN)⁹. The CMU will ensure, regular reports and follow ups throughout the project including a summary of all adopted policies related to SEA/SH, accountability and response framework and the capacity to implement the SEA/SH Action plan. In addition, the project's GM will need to provide multiple channels to report SEA/SH that include referral pathways for survivor care and support, safe and confidential staff and community reporting mechanisms. The GM, which will be handled by qualified staff will therefore have protocols for handling project-related SEA/SH complaints, including referral to GBV/SEA/SH support services. Finally, all MoSA's social workers and CMU relevant staff will need to have the adequate training on GBV and SEA/SH risks and sign a code of conduct. These requirements were laid out in the Environmental and Social Commitment Plan (ESCP) which was publicly disclosed¹⁰. The SEA/SH aspects mentioned therefore need to be carefully monitored throughout program implementation by dedicated and qualified staff in MoSA and the CMU and as per the World Bank's GPN.

⁸ Approximately 460 social workers

⁹<https://thedocs.worldbank.org/wbg/aem/service/pubdocredirect?path=https://pubdocs.worldbank.org/en/632511583165318586/ESF-GPN-SEASH-in-major-civil-works.pdf>

¹⁰ <http://www.pcm.gov.lb/arabic/subpg.aspx?pageid=18248>

6. Action Plan

Table 1: Recommended Actions to Address Project induced SEA/SH Risks

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
1	Sensitize the PCM on the importance of addressing SEA/SH on the project, and the mechanisms that will be implemented					
	Train MoSA social workers on SEA/SH to include <ul style="list-style-type: none"> a. Accountability and response framework b. Responsibilities and reporting c. Confidentiality and whistle blower protection clauses 	Secure technical expertise Prepare the training module and materials Conduct training for social workers staff at MoSA Include SEA/SH as an agenda in meetings	Preparation Throughout Project implementation	Social experts in MoSA	CMU task team	Number of training conducted Regular reports by social experts in MoSA
2	Conduct GBV/SEA assessment at project targeted communities (poor and vulnerable households).					
	Conduct an SEA/SH risk assessment of households benefiting from the ESSN project to inform risk mitigation, strategies including analysis of GBV issues, services and gaps in services.	Conduct a desk review of GBV/SEA in the poorest communities Develop Terms of Reference (TOR) for technical assistance required to carry out assessments, evaluations, development of packages and capacity building of social workers and MoSA staff	Preparation Throughout Implementation.	Social workers in MOSA	MOSA/CMU	Ongoing review during implementation support missions GBV/SEA risk report

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
3	Map out GBV/SEA/SH prevention and response service providers able to provide care to SEA and SH survivors					
<i>a.</i>	Deliver GBV/SEA/SH interventions in survivors ESSN beneficiary households by qualified social workers from MoSA	<ul style="list-style-type: none"> • Develop TOR for the nominated qualified social workers • Training of social workers 	Preparation/ implementation	MoSA	MoSA/CMU	<p>Monthly reports</p> <p>MoSA will carry out routine monitoring and assess the impact of social services provided.</p>
<i>b.</i>	Map out and review capacity and quality of GBV/SEA/SH social workers able to provide care and support SEA and SH survivors	<ul style="list-style-type: none"> • Review World Bank reports on existing and capacity service providers • Conduct field visits in households assessed as potentially at risk¹¹ of SEA/SH and collect data 	Preparation/ implementation	MoSA	MoSA/CMU	Monthly Reports
<i>c.</i>	Stakeholder consultations	<ul style="list-style-type: none"> • All stakeholders should be properly informed of SEA/SH risks (frequent consultations with a variety of stakeholders) • Identify stakeholders related to SEA/SH risks and who will be the reference when support services are not available at the SDCs and/or MOSA • Develop interview/ 	Prior to initiating the program and maintained throughout project implementation	MoSA	MoSA/CMU	<p>Ongoing consultations</p> <p>Monitoring of implementation of Stakeholder Engagement Plan</p> <p>Stakeholders should be regularly properly informed of SEA/SH risks and project activities to get their feedback on project design and safeguard issues.</p>

¹¹ Home visits conducted as part of eligibility for verification will be used for initial needs assessments of households

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
		<p>facilitation guides, be aware of the sensitivity of the issue.</p> <ul style="list-style-type: none"> • Conduct stakeholder meetings 				
d.	Develop a GBV/SEA/SH referral pathway(s) in line with the National Systems and guidelines being developed by MoSA.	<ul style="list-style-type: none"> • CMU to undertake a review of MoSA guidelines for referral of GBV cases • On the basis of mapped GBV/SEA prevention and response service providers • Develop a GBV/SEA/VAC referral list for service providers. • Disseminate the referral pathway/list to stakeholders 	Maintained throughout project implementation.	MoSA	MoSA/CMU	<p>Developed referral pathway(s)</p> <p>Number/type of GBV/SEA preventive and response services available.</p> <p>Number of referrals of SEA/SH incidents to the project GM</p>
4	Strengthen Institutional capacity for GBV/SEA risk mitigation and response					
a.	<p>SEA/SH risks adequately reflected in all Environmental and Social Instruments (ESI)</p> <p>Develop a SEA/SH Action plan including the Accountability and Response Framework A forecasted budget will be allocated</p>	<ul style="list-style-type: none"> • Ensure the implementation and monitoring of GBV/SEA/SH Action plan • Stakeholder engagement Plan to keep all parties informed about the project activities to specifically address 	<p>At the start and maintained throughout Project implementation.</p> <p>Continuous consultations throughout the project cycle not</p>	MoSA/CMU	MoSA/CMU	<p>Ongoing review, regular reports</p> <p>Ongoing Consultations</p>

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
	from category 2(component 3) to this task.	SEA/SH related issues	just during preparation.			
b.	<p>Support capacity of local systems to prevent and respond to GBV/SEA (police, health, legal)</p> <ul style="list-style-type: none"> Strengthen the reporting mechanisms & procedures of local systems by creating referral pathways inside each entity Strengthen a survivor centred referral and response. Strengthen coordination for better services with local/national GBV/SEA NGOs (such as ABAAD and KAFA) 	<ul style="list-style-type: none"> Identify key stakeholders to engage Develop training plan Develop training material/ content using global/national standards, human rights and survivor centered approaches Conduct training and mentoring Conduct regular coordination meetings with related specialized organizations for effective referrals 	Maintained throughout Project implementation.	<p>MoSA</p> <p>CMU</p> <p>Specialized NGOs</p>	<p>CMU in coordination with Mosa</p>	<p>Number of trainings conducted</p> <p>Number of coordination meetings conducted</p> <p>Level of Community awareness about GBV and SEA referral pathway</p>
c)	Develop and establish/review SEA/GBV response and accountability framework to include: Allegation Procedures to report SEA/GBV incidents and internally for case	<ul style="list-style-type: none"> Develop/review SEA/GBV Allegation Procedures to report SEA/SH issues Inform employees and the community on how to report cases of SEA/SH, 	Throughout project implementation	MoSA	CMU/MoSA	An established and functional accountability framework

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
	accountability procedures which should clearly lay out confidentiality requirements for dealing with cases	<ul style="list-style-type: none"> • Train all relevant employees (GM operators, social workers...) on survivor centered approach and how to proceed and face reported SEA/SH cases. • Confidentiality requirements for dealing with SEA/SH cases • Develop mechanisms to hold accountable alleged perpetrators; disciplinary action for violation of the CoC. 				
6	Review MoSA's capacity to prevent and respond to SEA/SH					
a)	Review for attention to SEA/SH a. Human resource manuals and staff capacity (ensure hiring both women and men without discrimination) b. Existing SEA and SH Policies and procedures. c. Project Code of Conduct.	<ul style="list-style-type: none"> • Capacity assessment of MoSA SEA/SH procedures • Review the GM Referral Pathways and reporting mechanisms • Review Project Frameworks to identify SEA/SH policies and procedures. 	At the beginning of the project and maintained throughout implementation	MoSA	CMU/MoSA	SEA/SH prevention and mitigation measures addressed in policy documents Establish how the referral pathway will be strengthened
b)	Develop Monitoring and Evaluation (M&E) programme, including	<ul style="list-style-type: none"> • Develop a comprehensive M&E plan to monitor work plan implementation 	Maintained throughout Project	MoSA	MoSA/CMU	M&E framework in place Ongoing reporting

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
	reassessment of risks as appropriate	<ul style="list-style-type: none"> Monitor SEA/SH Implementation Plan 	implementation.			.
c)	Conduct SEA/SH orientation training for project staff at MoSA and CMU ¹²	<ul style="list-style-type: none"> Develop a training plan Develop training materials Conduct training for project staff 	Project implementation.	MoSA/CMU	MoSA/CMU	Reports on trainings conducted for project staff
7	<i>Inform project affected communities about GBV/SEA/SH risks</i>					
a)	As referred in the SEP: Establish partnerships with NGOs, Community Based Organizations (CBOs)/ Civil Society Organization (CSOs) and local government institution	Identify and select partners and officially inform them Engage partners, conducting joint community meetings and awareness raising	Maintained throughout Project implementation.	MoSA/CMU	MoSA/CMU	Number of partnerships formed
b)	Identify, train and establish SDCs considered as focal points for GBV/SEA/SH activities	Establish a trained, dedicated and committed network of SDCs with referral pathways to designated NGOs if not qualified and able to deal with the relevant complaint	Maintained throughout Project implementation.	MoSA	CMU/MoSA	List of SDCs to refer to for SEA/SH risks
c)	Develop Stakeholder Engagement Plan for GBV/SEA related issues	Develop a comprehensive GBV/SEA Stakeholder Plan	Maintained throughout Project implementation.	CMU	CMU	Stakeholder Implementation plan developed

¹²The following link will be used for covering basics of support for survivors: <https://gbvguidelines.org/en/pocketguide/>

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
d)	Develop information dissemination strategy	Develop a strategy Identify the methods to disseminate the information Disclosure of information to stakeholders through various multimedia outlets (refer to the disclosed SEP ¹³)	Maintained throughout Project implementation.	DAEM, IMPACT platform	CMU in coordination with MoSA	A GBV/SEA/SH communication strategy in place
e)	Develop relevant Information Education and Communication (IEC) materials for community engagements	Develop relevant IEC materials translated in local languages of the project location	Maintained throughout Project implementation.	MoSA/CMU	MoSA/CMU	No and type of GBV/SEA IEC material developed
F0	Outreach to public schools on the risks of GBV/SEA/SH (where students attending are beneficiaries of the ESSN program)	Develop a school outreach Plan in consultation with the School heads and in case of missed attendance, a social worker from MoSA will conduct home visits to provide support or advice on possible services the household can access	Maintained throughout Project implementation.	MoSA/CMU	MoSA/CMU	Number of school outreaches conducted Monthly attendance will be monitored
g)	Conduct community sensitization	Develop a Community GBV/SEA and VAC sensitization program, material and messages Conduct community sensitization	Maintained throughout Project implementation.	MoSA/CMU	MoSA/CMU	Number of different channels of community sensitization conducted

¹³ <http://www.pcm.gov.lb/arabic/subpg.aspx?pageid=18248>

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
8	GBV/SEA sensitive channels for reporting in GM					
a)	Develop/Review GM for specific GBV/SEA/SH procedures	Undertake internal review of GM for GBV/SEA mitigation Integrate GBV/SEA entry points within the GM with clear procedures	Before and throughout project implementation	MoSA/CMU	MoSA/CMU	GM with GBV/SEA procedures and referral pathways integrated Ongoing monitoring and reporting on GM to verify it is working as intended.
b.	Identify and train GBV/SEA/SH SDCs who will be responsible of GBV/SEA/SH cases and referral pathways	Train the specific SDCs on GBV/SEA/SH risks, and the referral pathways to qualified designated NGOs if out of their qualifications	Throughout the project	MoSA	MoSA/CMU	MoSAs specific SDCs (selected and trained) Ongoing reporting
c)	Review GM reports/logs for GBV/SEA sensitivity	Review logs for GBV/SEA documentation to ensure it follows standards for documenting GBV/SEA cases	During project implementation.	CMU	CMU	Number of GBV/SEA/SH cases documented Ongoing reporting
9	Define and reinforce GBV/SEA/SH requirements in procurement processes and contracts					
a.	Incorporate GBV/SEA/SH sensitizations, requirements and expectations in all contract documents	Ensure that GBV/SEA issues are incorporated in all contracts signed by contractors and consultants Clearly define SEA/SH requirements and expectations. A budget will be allocated from category 2(component 3) to this task.	During project implementation.	CMU	CMU	GBV/SEA standards in procurement/contract document Contract documents with clearly defined SEA/SH clauses/requirements

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
b.	CoC signed and translated in the local language (the CoC requirements are based on the project's needs, the Bank's Standard Procurement Documents and the Lebanese Republic policies and goals)	<p>Define the requirements to be included in the CoC which addresses GBV/SEA/SH</p> <p>Review CoC for provisions/clauses that guard against GBV/SEA/SH</p> <p>Have CoCs signed by all those with a physical presence at the project site.</p> <p>Train project-related staff on the behavior obligations under the CoCs.</p> <p>Disseminate CoCs and discuss with employees and surrounding communities. Discussion at public consultations</p>	During Project implementation	CMU	CMU	<p>Regular reporting that CoCs are signed and that workers have been trained and understand their obligations</p> <p>Review of SEA/SH risks during project supervision (Mid-Term Review) to assess any changes in risk.</p>
10	<i>Separate toilet and shower facilities for men and women and GBV/SEA-free signage (for MoSA/CMU staff)</i>					

	Activity to Address SEA/SH risk	Steps to be taken	Timelines	Responsible	Responsible for Monitoring	Output indicators
a.	Implement appropriate project-level activities to reduce SEA/SH risks	<p>Have separate safe and easily accessible facilities for women and men. Locker rooms should be located in separate areas, well-lit and include the ability to be locked from the inside.</p> <p>Separate toilet facilities for men and women</p> <p>Visibility display signs that signal that the work environment is an area where SEA/SH is prohibited.</p> <p>As appropriate, public spaces around the project grounds should be well-lit.</p>	Throughout project implementation	CMU/MoSA	CMU	<p>Display signs/IEC materials</p> <p>Ongoing reporting</p>