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MINISTRY OF AGRICULTURE AND LIVESTOCK DEVELOPMENT

STATE DEPARTMENT FOR CROP DEVELOPMENT

FOOD SYSTEMS RESILIENCE PROJECT (FSRP)

**SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH)
PREVENTION AND RESPONSE PLAN**

September 2023

Table of Contents

Table of Contents	ii
Acronyms and Abbreviations	iii
Definition of terms	v
Executive Summary	vi
a. Background	vi
Legal, Policy and Institutional Framework	vii
Screening for SEAH Risks in the FSRP	vii
I. Introduction and Project Context	10
1.1 Background.....	10
1.2 Project Description.....	10
1.2.1 Project Geography.....	11
1.2.2 Implementation Arrangements.....	11
1.2.3 Project Oversight, Policy Guidance, Governance and Coordination.....	12
1.3 The Concept of SEAH.....	12
1.4 Guidance by the WB on SEAH.....	12
1.5 Screening for SEAH Risks in the FSRP.....	13
I Table 1: SEAH Risk Screening Matrix	15
2. Policy, Legal and Institutional Context	19
2.1 Policy Framework.....	19
2.2 Legal and Institutional Framework.....	19
2.2.1 The Constitution of Kenya, 2010.....	19
2.2.2 The Sexual Offences Act, 2006.....	19
2.2.3 The Employment Act, 2007.....	20
2.2.4 The Penal Code, Cap 63 Laws of Kenya.....	20
2.3 International and Regional Treaties and Conventions.....	20
2.3.1 The Convention on the Elimination of All Forms of Discriminations Against Women (CEDAW). 20	
3. SEAH Prevention and Response Plan	22
3.1 The Management of the SEAH Prevention and Response Plan.....	22
3.2 Grievance Mechanism (GM).....	23
3.3 Support Services.....	26
Table 2: Prevention and Response Plan for FSRP	28
4. Conclusions and Recommendations	39
References	40
ANNEXES	41
Annex 1: Code of Conduct Form for Contractor’s Employees/Workers	41
Annex 2: SEAH Reporting Process	58
Annex 3: SEAH Treatment and Counselling Procedures	59
Annex: 4: Sample of GBV Referral Centers and Service Providers in the Counties and National Government	62

Acronyms and Abbreviations

CoC	Code of Conduct
CBO	Community Based Organization
CDD	Community Driven Development
CIGs	Community Interest Groups
CoK	Constitution of Kenya
CSO	Civil Society Organizations
EAs	Environmental Assessments
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FPOs	Farmer Producer Organizations
FS	Feasibility Study
GoK	Government of Kenya
GM	Grievance Mechanism
FSRP	Food systems Resilience Project.
ICT	Information and Communication Technologies
IPOs	Indigenous Peoples Organizations
IPV	Intimate Partner Violence
KNCHR	Kenya National Commission on Human Rights
Kshs	Kenyan Shilling
M&E	Monitoring and Evaluation
MDAs	Ministries, Departments and Agencies
NGO	Non-Governmental Organization
OP	Operational Policy
OSH	Occupational Safety and Health
PCU	Project Coordinating Unit
PDO	Project Development Objective
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SDS	Social Development Specialist
SH	Sexual Harassment
ToR	Terms of Reference
SA	Social Assessment
SEAH	Sexual Exploitation, Abuse, and Harassment
SIA	Social Impact Assessment
SP	Service Provider
UN	United Nations
VMGs	Vulnerable and Marginalized Groups
VMGF	Vulnerable and Marginalized Groups Framework

VMGP	Vulnerable and Marginalized Groups Plan
WB	World Bank
WBG	World Bank Group
WRUA	Water Resources Users Association

Definition of terms

Gender-Based Violence (GBV): The Inter-Agency Standing Committee (IASC) defines gender-based violence as “an umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed (gender) differences between males and females. SEAH broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community, at large. These include sexual violence, domestic or Intimate Partner Violence (IPV), trafficking, forced and/or early marriage, and other traditional practices that cause harm.

Sexual Exploitation: The United Nations defines “sexual exploitation” as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse on the other hand is “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. “SEA” is therefore a form of GBV and generally refers to acts perpetrated against beneficiaries of a project by staff, contractors, consultants, workers and partners.

Sexual harassment is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment. It occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

Executive Summary

a. Background

This Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plan has been prepared for the Food systems and Resilience Project. The National Project Coordinator (NPC) will take overall responsibility for the adoption and implementation of the SEAH prevention and Response action Plan. The GBV consultant under the Ministry of Agriculture and Livestock Development (MoALD), the Senior Social Development Specialist and the various Social Specialist in the Food systems Resilience Project will provide technical oversight and day-to-day management of the Plan. The FSRP has secured all specialists except the GBV specialist who had earlier been secured by ELRP and will be immediately given additional days based on the contract with ELRP. The SEAH risk rating is **Substantial**.

The Project Development Objective (PDO) is to increase the resilience of food systems and preparedness for food insecurity in participating countries. The Food Systems Resilience Program (FSRP)—referred to in this document as “the MPA,” or “the Program”—aims both to tackle the underlying structural challenges of food insecurity and reduce beneficiaries’ sensitivity to unpredictable climate, crisis, and conflict events. It aims to achieve this by building resilient food production capacity, promoting the sustainable use of natural resources, enhancing food marketing, fostering resilience-focused public policies, and improving regional coordination. The proposed project intends to out-scale and cover the whole northern region comprising of 13 counties (**Baringo, Marsabit, Wajir, Mandera, Elgeyo Marakwet, Garissa, Tana River, Lamu, West Pokot, Laikipia, Isiolo, Turkana, Samburu,**) the country’s pastoral nomadic economic block approximately 80% of Kenyan land size. These are also counties that have been the worst impacted by the prevailing drought.

Over the recent years the frequency and severity of drought has been increasing, this, coupled with overstocking, poor grazing management, degraded environment and the limited coping strategies has had a devastating effect on the lives and livelihood of pastoral communities. This has resulted to pastoralists taking a long time to recover as seeds/vegetative materials in the ground do not regenerate even after the rains. The livestock producing ecosystems have become extremely fragile from degradation, encroachment by invasive weed species and recurring droughts of increasing intensity resulting in reduced capacity to support plants or animal production.

Poor access to pasture and migration to access can exacerbate the vulnerability of women and girls to SEAH. The following project-related risks on SEAH have been identified and need to be addressed in order to mitigate the risks.

- a) Small civil works are predominantly male dominated (welders, drillers, drivers’ experts and TA) most of them separated from their families on the project site for a period of time. If not carefully managed, an influx of labor can negatively impact a project area,
- b) Potential abuse of power and sexual exploitation in labor practices: hiring and employment practices that seek to increase the number of women involved in project activities can expose women to incidents of sexual exploitation, harassment, or violence.
- c) Women and girls’ exclusion from priority-setting and community decision making processes related GBV risks: Exclusion from spaces of voice, agency and decision-

making can lead to decisions that further harm or marginalize women and girls. Prioritization that does not consider the unique and diverse needs of women and girls, especially in development and management activities, might increase their risk to GBV.

- d) Pervasive corruption among persons in authority, as well as a lack of awareness and impunity towards SEAH issues and violations may discourage qualified women from participating in the project activities or reporting SEAH incidences.
- e) Potential amplification of community and household tensions because of poorly designed infrastructure which are insensitive to gender dynamics in a given context can exacerbate exposure to SEA and other forms of GBV. Some of the FSRP activities may cause SEAH risks for workers, spouses/partners, community members by project workers, and among project workers.

This SEAH Prevention and Response Plan details the necessary operational measures and protocols that will be put in place to address all forms of SEAH related to the project and how they will be integrated over the life of the project. These include how to address any SEAH allegations that may arise and procedures for preventing and responding to SEAH. The Plan also details how reports on SEAH will be handled (investigation procedures) and disciplinary action for violation of the Code of Conduct (CoC) by project workers.

Legal, Policy and Institutional Framework

Kenya has robust legal, policy and institutional frameworks for addressing GBV. These include the constitutional provisions such the right for persons to be treated with dignity. The National Policy for the Prevention and Response to Gender Based Violence - 2014, County Government Policy on Sexual and Gender Based Violence - 2017, and the Legislative Framework on Sexual and Gender Based Violence for County Governments - 2017. The key relevant legislations are the Sexual Offences Act, 2006, the Employment Act, 2007, and the Penal Code, Cap 63 Laws of Kenya. International instruments against GBV operative in Kenya are the Convention on the Elimination of All Forms of Discriminations Against Women (CEDAW), the African Charter on Human and Peoples' Rights (Banjul Charter), and the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol). The Kenya legal framework sets the age of consent at 18 years and above. The Employment Act of 2007 covers sexual exploitation and harassment and is reinforced by the Sexual Offences Act of 2016 which outlines penalties for these offences. The requirements for mandatory reporting are covered under incidents reporting act.

Screening for SEAH Risks in the FSRP

The Thirteen where the FSRP will be implemented are are 70% Muslim dominated with most community members practicing polygamy, a risk factor for GBV. School enrolment and retention rates among the counties are low due to early marriages, teenage pregnancy, lack of money for school fees, long distances to schools, and lack of sanitation facilities and supplies among other factors (Ministry of Education 2016).

It's therefore essential for the project to take into consideration the moderately expected labor influx, the high levels of poverty, polygamy, harmful cultural practices and norms, violence against women and girls and other interacting factors to exacerbate the risk of SEAH.

If not well managed, these factors can lead to further marginalization and abuse of women, girls and children who are already vulnerable due to the prevailing socio-cultural situation. Some of the factors that contribute to vulnerability of women and girls to SEAH in the project areas include the following:

i) Poverty and power dynamics. GBV is deeply rooted in unequal power relations and negative gender norms. The risk of SEAH is therefore higher in rural pastoral communities where poverty and unemployment disproportionately affecting women and girls is more pronounced. Collectively, these factors are likely to affect not only the vulnerability of women and girls to SEAH, but also the commitment to SEAH prevention as well as the provision and uptake of GBV services. Baringo, Marsabit, Wajir, Mandera, Garissa, Tana River, Lamu, West Pokot, Laikipia, Isiolo, Turkana, Samburu) counties have over 60 percent of their population living below the poverty line compared to the national average of 26 percent.

ii) Societal norms: Women and girls are at usually high risk of SEAH because of societal norms hinged on patriarchal tendencies that perpetuate power differentials between males and females, and support or condone male violence against women and girls. Social attitudes towards violence against women and girls will also influence the reporting rates and management of SEAH cases by local actors. An important additional risk factor is labor influx. Labor influx and the extent to which a community has capacity to absorb labor influx, as well as the inflow of income to workers, can exacerbate already existing inequities between workers and community members.

iii) Education and literacy: Comparatively low levels of education and literacy among girls, that leads to high unemployment rates among women. These factors weaken women's and girls' confidence as they seek menial jobs in project sites. Besides, low confidence means they are most at risk of SEA from project workers who often have higher incomes than usually available to community members.

Some of the forms of SEAH committed by project workers against women and girls in the community that could arise from the project include rape and sexual assault, sexual exploitation, and sexual harassment. This is likely to happen during project implementation when the workers start operating in the project areas. Also, this is likely to occur during operation when buyers and other stakeholders converge in the project areas. Sexual harassment may include touching, use of abusive, and demeaning or culturally inappropriate language. Sexual exploitation will likely include transactional sex and other forms of humiliating, degrading or exploitative behavior.

The FSRP project activities and works where applicable will present a formal work environment with employment opportunities for local people and those come with SH risks to local women and girls. Sexual harassment is a risk for any work environment, particularly environments that are stringently hierarchal, give significant and/or undue power to management, and that do not promote and reflect female leadership. Other risk factors for SH include female laborers working alongside male laborers without adequate supervision, protective clothing or equipment, separate washrooms for males and females at work sites, and specific feedback mechanisms for females to share concerns about their working environments, including concerns about sexual harassment. The Labour Management

Procedures require the project to establish workers' grievance mechanism that will facilitate channeling of complaints and response in a way that it is responsive to GBV issues.

Prevention and response to FSRP-related risks of SEAH will require concerted and multifaceted efforts bringing together many sectors including Ministries, Departments and Agencies (MDAs) such as health facilities, SEAH service providers and other care givers such as civil society organizations (CSOs) and national government offices responsible for children (e.g. children offices), and the police. The project will coordinate with these actors in creating awareness in the host communities and project staff to reduce need for response efforts. This Plan identifies some of the concerted efforts including community awareness and education, capacity building for project staff in SEAH and employment of SEAH experts, adequately resourcing the SEAH function in the project and enlisting the supplementary support of other SEAH Prevention and Response actors such as health providers, CSOs, Community based Organizations (CBOs), and Non-Governmental Organizations (NGOs).

The SEAH risk for this project is adjudged **substantial**. The main risk identified is the abuse of trust, power and the exchange of favors carried out by staff, consultants or workers of companies associated with construction activities in the project. People working for the project will receive awareness training on GBV issues and their repercussions. The project has a qualified GBV specialist in place working with ELRP who can be coopted to work closely with the Senior Social Development Specialist (SSDS) at the national level to coordinate efforts towards mitigation of SEAH prevention and Response actions in this Plan. It is estimated that the implementation of this Plan will cost Kes 20,000,000 over the period of 6 years of implementation.

1. Introduction and Project Context

1.1 Background

1. Food Systems Resilience Program (FSRP) is a Multi-Phase Programmatic Approach (MPA) covering several countries in Africa with the objective of increasing the resilience of food systems and preparedness for food insecurity in participating countries. The proposed Program provides a comprehensive framework (and not a business-as-usual approach) to intervene at both the national and regional levels. The Food Systems Resilience Program (FSRP)—referred to in this document as “the MPA,” or “the Program”—aims to both tackle the underlying structural challenges of food insecurity and reduce beneficiaries’ sensitivity to unpredictable climate, crisis, and conflict events. It aims to achieve this by building resilient food production capacity, promoting the sustainable use of natural resources, enhancing food marketing, fostering resilience-focused public policies, and improving regional coordination. In that respect, while the Program can, by design, engage in short-term emergency response activities, it is to a large extent designed to complement emergency response activities and focus on medium-term investments that will help break the cycle of crisis and response.
2. Projects create changes in the communities in which they operate and can cause shifts in power dynamics between community members and within households. Male jealousy, a key driver of GBV, can be triggered by labor influx on a project when workers are believed to be interacting with community women. Hence, abusive behavior can occur not only between project-related staff and those living in and around the project site, but also within the homes of those affected by the project.
3. The SEAH Prevention and Action Plan will be implemented alongside the project prepared: a) Labour Management Procedures (LMP); b) Stakeholder Engagement Plan (SEP); c) Environmental and Social Management Framework; d) Resettlement Policy Framework. Community sensitization of the SEAH and GBV SEA risks will be guided by the SEP and will be included in environmental and social management plans prepared for the sub-projects.

1.2 Project Description

4. The project development objective (PDO) of the Kenya FSRP is to increase preparedness for food insecurity and improve the resilience of food systems in project areas

Component 1: (Re-) Building Resilient Agricultural Production Capacity

Subcomponent 1.1: Data and Digital Agriculture Systems at the National and County Levels

Subcomponent 1.2: Climate-Smart Agriculture Technologies and Services

Subcomponent 1.3: Community Engagement and Technology Transfer Including through Digitization

Component 2: Supporting the Sustainable Development of Natural Resources for Resilient Agricultural Landscapes

Subcomponent 2.1: Water Availability for Crops and Livestock

Subcomponent 2.2: Rangeland Management for Crops and Livestock

Component 3: Getting to Market

Subcomponent 3.1: Strengthening of Farmer Producer Organizations

Component 3.2: Market Infrastructure and Enterprise Development

Subcomponent 3.3: Creditworthiness of Crop and Livestock Farmers

Component 4: Promoting a Greater Focus on Food Systems Resilience in National and Regional Policymaking

Subcomponent 4.1: Prioritization of Food System Resilience in Public Policy and Spending

Subcomponent 4.2: Institutional Capacity for the Implementation of Resilience-Enhancing Policies

Component 5: Contingent Emergency Response Component (CERC)

Component 6: Project Management

Subcomponent 6.1: Project Coordination

Subcomponent 6.2: Project Monitoring, Learning, Knowledge management, and Cross-Cutting Issue.

1.2.1 Project Geography

5. The project will make investments at the national, county, and at farm levels. National investments will include capacity building, technical assistance, policy analysis, policy coordination, and targeted market infrastructure upgrades. County- and farmer- level investments will be undertaken in 13 counties: **Baringo, Marsabit, Wajir, Mandera, Garissa, Tana River, Lamu, West Pokot, Laikipia, Isiolo, Turkana, Samburu, and Elgeyo-Marakwet.**
6. **Project Beneficiaries.** The project aims to support 300,000 crop and livestock farmers, most of them operating at a small scale. The project will also benefit many other value chain actors including extension workers, aggregators, logistics support providers, and various SMEs. Nearly 5,000 jobs are expected to be created by the expansion of FPO, anchor off-taker, SME, and agritech operations, and the development of agro-entrepreneurship, and market linkages

1.2.2 Implementation Arrangements

7. The project will benefit significantly from the existing implementation capacity and strong community institutions developed under KCSAP, NARIGP, and ELRP both at the national and county levels. At the national level, a fully functional national project coordination unit (NPCU) has been established with subject matter, financial management, procurement, and environment and social safeguard specialists that are supporting county implementation units. Each of the 13 counties already has fully functional implementation and coordination units (CPCUs) with trained specialists. The strong technical and fiduciary systems already developed under NARIGP, KCSAP, and ELRP will facilitate the Kenya FSRP's efficient implementation. The project will also leverage the existing three-tiered community-level institutional arrangement developed under KCSAP, NARIGP, and ELRP for implementation purposes.

8. The existing NPCUs of KCSAP and ELRP will be merged and the integrated team will lead the Kenya FSRP's implementation at the national level. Similarly, the existing KCSAP, ELRP, and NARIGP teams in each of the 13 counties will be merged and the integrated teams will lead the Kenya FSRP's implementation at the county level. The NPCU and CPCUs will be strengthened by bringing in new staff that have the appropriate expertise in newer focus areas such as in irrigation, financial services, data science, and digital technologies. The project will also strive to bring in highly qualified graduates from Kenya's leading agricultural, environmental science, and business schools (universities or vocational learning institutions) to work on discrete technical assistance assignments.

1.2.3 Project Oversight, Policy Guidance, Governance and Coordination

9. At the national level, the GoK will be represented by the National Treasury (NT) and MoALD will be the main implementing agency. Within MoALD, the State Department for Crop Development will assume responsibility for the Kenya FSRP in coordination with the State Department for Livestock Department (SDLD). Overall project oversight and policy guidance will be led by KCSAP's existing steering committee (NPSC) at the national level, and by the three existing projects' CPSCs. To enhance their ownership of the project, participating county governments will be fully involved in the decision-making process at the national level. They will be represented in the NPSC by the Chair of the Agriculture Committee of the Council of County Governors (CoGs), and they will be represented in the National Technical Advisory Committee (NTAC) by county executive committee members (CECMs).
10. At the community level, project implementation will be backed by the strong institutional architecture developed at the community level under KCSAP, NARIGP, and ELRP. CIGs will serve as the primary interface between project interventions and smallholder farmers and play a crucial role in enabling the delivery of training and extension services and helping farmers mobilize savings.

1.3 The Concept of SEAH

11. SEAH can be a confusing concept because its discussion is often done in the context of culture rather than facts of aggression, intrusion and human rights abuse. The cultural lens on SEAH imply that some aggressions and intrusions could be considered offensive in one culture and excused in another as part of usual and normal social interaction.

1.4 Guidance by the WB on SEAH

12. The WB Guidance Note¹ defines four key areas of GBV risks (listed below) that may be exacerbated by World Bank financed projects. However, SEA and workplace SH are

¹ WB 2018, page 3.

the types of GBV that are the most likely to occur in or be exacerbated World Bank-financed projects. This Action Plan focuses on how to address SEAH that's project related.:

- a) SEA - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion;
- b) Workplace sexual harassment - unwanted sexual advances; requests for sexual favors, sexual physical contact;
- c) Human trafficking - sexual slavery, coerced transactional sex, illegal transnational people movement; and
- d) Non-SEA - physical assault, psychological or physical abuse, denial of resources, opportunities, or services and IPV.

13. In response to the potential risks implied in the discussion of the concepts above, FSRP will establish and implement a SEAH Prevention and Response Plan. The Plan details the operational measures that will be put in place to mitigate the risks of SEAH that are project-related, including ensuring that project-established GMs are in place to receive reports and refer survivors for further support safely and confidentially.

1.5 Screening for SEAH Risks in the FSRP

14. Over the recent years the frequency and severity of drought has been increasing, this, coupled with overstocking, poor grazing management, degraded environment and the limited coping strategies has had a devastating effect on the lives and livelihood of pastoral communities. This has resulted to pastoralists taking a long time to recover as seeds/vegetative materials in the ground do not regenerate even after the rains. The livestock producing ecosystems have become extremely fragile from degradation, encroachment by invasive weed species and recurring droughts of increasing intensity resulting in reduced capacity to support plants or animal production
15. Poor access to water, sanitation and hygiene (WASH) can exacerbate the vulnerability of women and girls to violence, especially in rural communities with high poverty levels, unequal power relations and harmful gender norms. The following project-related risks on SEAH have been identified and need to be addressed in order to mitigate the risks.
16. Potential abuse of power and sexual exploitation in labour practices: Hiring and employment practices that seek to increase the number of women in climate smart agricultural practices can expose women to incidents of sexual exploitation, harassment, or violence. Additionally, unequal gender norms and harmful beliefs about the roles of women inside and outside the home run the risk of creating hostile environments for female workers. In cases where female workers have less time for traditional gender-related work such as childcare, this can also lead to a potential increase in IPV.
17. Women and girls' exclusion from priority-setting and community decision making processes related GBV risks: Exclusion from spaces of voice, agency and decision-making can lead to decisions that further harm or marginalize women and girls. Prioritization that does not consider the unique and diverse needs and capabilities of women and girls,

especially in the scholarship component on Msc and PHDs under MoALD and mentoring programme in groundwater planning, development and management, might increase the risk of qualified female candidates to hostility, harassment and exploitation.

18. Pervasive corruption among persons in authority, or lack of accountability on reported cases of GBV/SEAH, could also keep qualified women from submitting applications for available project related activities or reporting SEAH incidents.
19. Potential amplification of community and household tensions because of poorly designed infrastructures and water points which are insensitive to gender dynamics in a given context can exacerbate exposure to SEA and other forms of GBV.
20. Some of the factors that contribute to vulnerability of women and girls to SEAH in the project areas include:
 21. Poverty and unequal power dynamics. All the project counties have high levels of poverty (over 65 percent of the population lives under the poverty line), far above the national average. In addition, these areas are currently experiencing extreme drought and food insecurity, further heightening the vulnerability of the affected communities. These factors along with existing gender inequalities and increase the risk of SEAH for women and girls in these communities.
 22. Societal norms. Women and girls are at usually substantial risk of SEAH because of societal norms that perpetuate power differentials between males and females, and support or condone males' violence against women and girls. An important additional risk factor is labor influx. Labor influx and the extent to which a community has capacity to absorb labor influx, as well as the inflow of income to workers, can exacerbate already existing inequities between workers and community members and expose vulnerable groups, particularly women and girls, to exploitation, harassment and hostility (See Annex I: Code of Conduct for Contractors' Employees/Workers)
23. Some of the forms of SEAH committed by project workers against women and girls in the community that could arise from the project include rape and sexual assault, physical and emotional abuse. Sexual harassment may include inappropriate touching, use of abusive, and demeaning or culturally inappropriate language. Sexual exploitation will likely include transaction sex and other forms of humiliating, degrading or exploitative behavior.
24. The subprojects will present a formal work environment that comes with SEAH risks to local women and girls. Sexual harassment is a risk for any work environment, particularly environments that are stringently hierarchal, give significant and/or undue power to management, and that do not promote and reflect female leadership. Other risk factors for SEAH include female laborers working alongside male laborers without adequate supervision, without separate washrooms for males and females; and without specific feedback mechanisms for females to share concerns about their working environments, including concerns about sexual harassment.

25. Prevention and response to project-related risks of SEAH requires concerted and multifaceted efforts bringing together many sectors including Ministries, Departments and Agencies (MDAs) and civil society. The project will coordinate with these actors in creating awareness in the host communities and project staff to reduce any need for response efforts.
26. The project has been screened for SEAH risks using the standard World Bank Tool as shown in Table I. The significant risks identified include abuse of trust, power and the exchange of favors by staff, consultants, or workers of companies associated with drilling and construction activities of the project. This risk is likely to occur at the interface between the project with the community, community with the contractors, community with companies and consultants and so on. This project presents all the foregoing scenarios of SEAH risk sites hence this prevention and response plan. Therefore, the SEAH risks are rated **Substantial** as shown in Table I.

Table I: SEAH Risk Screening Matrix

Project Context	Response	Risk Rating	Comment
Is project in an area with active emergency or humanitarian situation?	Yes	Substantial	The thirteen counties are recently experienced drought and receiving food relief. Continuous low rainfall over the years, The economic challenges resulting have negatively affected livelihoods in the project area and increased incidences of poverty and inequality.
How much infrastructure construction, upgrading or rehabilitation does the project entail?	Yes	Substantial	The Project will have small civil works and construction of infrastructure such as water points. Livestock markets, fodder stores, etc. No major civil construction works are expected.
What is the extent of the influx of labour associated with project activities?	Low influx	Substantial	The project will require the recruitment of non-local staff for the implementation of activities, technical assistance, and awareness-raising activities. Because of the small-scale civil works, these will lead to labour influx. Additionally, during operation phase resultant activities could lead to the arrival of new workers including sex workers who follow labour income.
During the preparation of the project, were consultations carried out with residents, women's associations, and children?	No	Substantial	Consultations are on-going during the project preparation, especially as part of preparation of ESF documents. Residents, women, and women's associations are being consulted widely by the project both at national and county level. More consultations will be carried out with women's organizations as part of the wider continuous

Project Context	Response	Risk Rating	Comment
			stakeholder engagement during project implementation with due consideration to COVID 19 protocols.
During the consultations, were aspects of SEAH raised by the participating women?	yes	Substantial	Yes concerns of gender based violence were raised during Feb 2023 consultations SEAH reporting and management protocol will be prioritized during the consultations, with an emphasis on survivor-centred approaches.
Does the project area include areas of high poverty?	Yes	Substantial	Baringo, Marsabit, Wajir, Mandera, Garissa, Tana River, Lamu, West Pokot, Laikipia, Isiolo, Turkana, Samburu, and Elgeyo-Marakwet.) have a relatively bigger population living below the poverty line compared to the National average of 26%.
Is the project located in regions that are difficult to supervise (remote or difficult to access areas)?	Yes	Substantial	Kenya's ASALs, make up 89% of the country's total land surface meaning that project activities are purely in ASAL and therefore spread over a wide area which makes supervision challenging in those counties in the ASALs.
Is the project located in an urban, peri-urban, or rural area?	Rural, peri-urban and Urban	Substantial	The project is predominantly located in rural areas.
Are project activities on a school route or other routes that women and girls use to carry out their daily activities	Likely	Substantial	The proposed project activities will most likely locate near or on school routes due to the rural emphasis. Nonetheless, even with labour influx expected the risk is substantial since all workers will have signed CoC.
Are women working near men without supervision?	Likely	Substantial Risk	Project workers will be supervised but there is the possibility that men and women may work in proximity, given the nature of the activities.
Is there a National Action Plan on Addressing Violence Against Women and Girls/GBV	Yes	Substantial	The National Policy for the Prevention and Response to Gender Based Violence - 2014 and Legislative Framework on Sexual and Gender Based Violence for County Governments - 2017 are in place in Kenya. The provision in that law required county governments to adopt county specific gender-based violence framework. Only Garissa County Assembly has passed the legislation to adopt

Project Context	Response	Risk Rating	Comment
			the above. the other 12 County Governments have not yet adopted the framework.
Is there at the National level SEAH Working Group	Yes	Low Risk	The SEAH Sector working group is under the National Gender Sector Working Group (GSWG). There are also, county-based SEAH sector working groups which will be ideal in supporting this Plan.
Is there a National referral protocol for SEAH Service Provision	Yes	Substantial	Counties like Garissa have one active safe house supported by the county government and a pathway developed by NGOs. Turkana have an active service provider Caritas while the other counties are in the process of developing a pathway protocol. The available safehouses and health centres offer psychosocial support and medical care. They are linked to NGOs that readily offer legal services to the survivors.
Does the project have the capacity to monitor the risks of harassment and gender-based violence throughout the scope and cycle of the project?	Yes	Low risk	Yes, the project will adopt and resource SEAH Prevention and Response Plan and engage a SEAH/GBV expert.
Do the project beneficiaries know where to get help regarding SEAH? Are there police stations with SEAH or gender Desks? Are there toll free SEAH reporting telephone lines?	This will form part of community training	Substantial Risk	There is a general awareness of GBV/SEAH risks in the Kenyan population and there exist SEAH support and care services in every county. Kindly refer table on service providers in each county. However, these may not be fully accessible to people living in the rural areas where the project will be implemented mainly due to high levels of poverty, low literacy and lack of awareness. Communities in these rural areas most likely do not have adequate information on SEAH risks or reporting mechanisms and services available to them.
Evaluation of SEAH Risk in FSRP	Substantial		

2. Policy, Legal and Institutional Context

2.1 Policy Framework

27. The National Policy for the Prevention and Response to Gender Based Violence - 2014, constitutes the guidance for the prevention and response to GBV. The policy, which was formulated by the Ministry of Devolution and Planning seeks to among other objectives, improve enforcement of existing laws to reduce, curb or prevent SEAH.
28. County Government Policy on Sexual and Gender Based Violence - 2017. The policy is tailored for all County Governments and aims at ensuring that every county government can address SEAH issues that they face. It provides the framework for counties to recognize SEAH as a human rights violation and to provide resources to curb it in the respective counties.
29. Legislative Framework on Sexual and Gender Based Violence for County Governments - 2017. This model law is designed to provide measures for awareness, prevention, and response to sexual and gender-based violence, to provide for the protection, treatment, counselling, support, and care of victims of SEAH, and for connected purposes (Annex 3. The framework has not yet been adopted by any of the five counties FSRP4R is operating in.

2.2 Legal and Institutional Framework

2.2.1 The Constitution of Kenya, 2010

30. Article 10(2)(b) of the Constitution recognizes human dignity, equity, social justice, inclusiveness, equality, human rights, non-discrimination, and protection of the marginalized as part of National values and principles of governance. Therefore, any illegal aggression on the person that compromises human dignity is unconstitutional. Hence SEAH is not only illegal, but also a human rights violation and unconstitutional in Kenya.
31. *Article 28* of the Constitution guarantees human dignity while *Article 29* guarantees every person the freedom and security and this includes the right not to be subjected to any form of violence from either the public or private sources and not to be treated or punished in a cruel, inhuman, or degrading manner. The Constitution has an elaborate set of protective remedies for all forms of violence, including SEAH.

2.2.2 The Sexual Offences Act, 2006

32. This Act of Parliament is aimed at protecting from the harm of unlawful sexual acts. Section 5 of the Act incriminates sexual assault with a possibility of imprisonment for life upon conviction.
33. *Section 6*, read together with *section 43*, addresses intentional and unlawful acts and includes instances where people in authority may use their authority so as the other

party is unable to show resistance or unwillingness to such illegal sexual advances. This makes sexual abuse and exploitation a crime in Kenya.

34. *Section 23(1)* of the Act makes sexual harassment an offence punishable under the law for a term not less than 3 years or a fine of not less than Kenya Shillings One Hundred Thousand (KShs.100,000) or both.

2.2.3 The Employment Act, 2007

35. This Act of Parliament regulates employment in Kenya and sets out the rights and obligations between an employer and an employee.
36. *Section 6* of the Act defines sexual harassment and makes it a requirement for an employer who has twenty or more employees to have a policy statement on sexual harassment and ensure that every employee knows about it. In the project under preparation the need for a code of conduct for the contractor and for employees cannot be negated.

2.2.4 The Penal Code, Cap 63 Laws of Kenya

37. The Penal Code does not specifically address GBV offences. However, section 250 and 251 of the code on assault and assault causing actual bodily harm respectively, may be invoked against any person who assaults another one regardless of gender.

2.3 International and Regional Treaties and Conventions

2.3.1 The Convention on the Elimination of All Forms of Discriminations Against Women (CEDAW).

38. Kenya ratified this treaty in 1984. The treaty seeks to realize equality between men and women by ensuring that there is no discrimination against women in all spheres of life. This means that women should compete for the same positions with men whenever employment opportunities arise. Any discrimination will therefore constitute SEAH against women.
39. Article I of the Convention defines “discrimination against women” to mean “any distinction, exclusion or restriction made based on sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.”
40. Article 5 of the charter guarantees every individual the right to dignity which includes the protection from all forms of exploitation and human degradation. SEAH manifests different forms of inhuman treatment to victims and in many cases is a form of exploitation.
41. Article 3 of the protocol seeks to eliminate all forms of discrimination against women and require States Parties to pass necessary legislation to ensure equality between women and men.

42. Article 4 of the protocol guarantees every woman dignity and requires States Parties to adopt appropriate measures to prohibit any exploitation or degradation against women.
43. Overall, Kenya has the requisite policy, legal and institutional framework to prevent and curb SEAH. However, the vice of SEAH has not been eradicated. Every effort at preventing and curbing the vice is a work in progress in every sector of society. The project aims to prevent and respond to SEAH complaints and incidences in an effort to ensure that the project does no harm to the beneficiaries and workers.

3. SEAH Prevention and Response Plan

44. Table 2 provides a summary of the prevention and response plan for SEAH to be customized for use in FSRP. The PCU staff will include a GBV consultant who will Coordinate sensitization of all project structures on SEAH. He/She will also be involved in mainstreaming of the SEAH issues into all project activities at the PCU and county level. The SEAH issues will be cascaded to the sub projects level by the social safeguards officer at the county.

3.1 The Management of the SEAH Prevention and Response Plan

45. The overall project oversight and policy guidance will be provided by NPC, which will be co-chaired by the relevant Principal Secretary (PS), MoALD and other key staff PIU Coordinators, Financial Specialist and Procurement Specialist, an M&E Officer, a Contracts Manager, and the senior social development specialist of the project. The project has identified a full time SEAH/GBV expert consultant to work closely with the project senior development safeguards lead to oversee the implementation of this Plan at the national level.
46. There will be formal coordination of activities between the County CPCUs in each of the thirteen counties which will comprise the Country Project Coordinator (CPC), County Thematic Technical Leads, and County M&E, Finance, full time Environmental Specialist, a Social Specialist and Procurement Assistants. The National Project Coordinator (NPC) will be overall responsible for the adoption and implementation of the SEAH prevention and Response action Plan. The contractor project Managers will be responsible at the contractor site level. While SEAH consultant will be the technical support, the Social Specialists at PIUs and County CPCU who have the primary responsibility to ensure that the implementation of the plan on day to day basis.
47. The SEAH Consultant will work closely with Senior Social Specialists to provide technical oversight and coordinate the following:
 - Service and capacity mapping out of SEAH prevention and response service providers
 - Train all the GM focal points at the various levels that are involved in the SEA/SH reporting planned
 - Develop the referral pathway for the project;
 - Develop a monitoring and evaluation framework for SEAH;
 - Formulate a training program for Project staff and workers at the various levels – national, county and community where necessary engage the service providers as mapped in the county
 - Train all the officers at various levels on SEAH approach, prevention and response plan
 - Ensure that survivor centered approach to SEAH is implemented;
 - Sensitize communities on the SEAH Prevention and Response Plan by continuous engagement of the service providers and County CPCU staff

- Document/log all SEAH cases including that status of cases (ongoing, completed, closed, etc.);
- Monitor and report on the Prevention and Response actions of the Plan;
- Notify the County CPCU, PIU and PCU on any concerns related to SEAH for the project;
- Report project-related SEAH to the PCU and World Bank within the stipulated timeframe of 48 hours.

3.2 Grievance Mechanism (GM)

48. The project will put in place a GM with multiple channels to facilitate confidential logging in of SEAH complaints in all the project locations. It will be necessary to identify and integrate SEAH entry points within the GM with clear procedures and tools for safe, confidential, and ethical management of related complaints. Considerations related to SEAH will be integrated into GM explicitly developed for project workers.
49. As part of the overall project, consultations on the GM with affected communities (particularly with women, girls and people living with disabilities) will be done to determine the preferred alternatives to in-person complaints (e.g., phone, online, other). The process will emphasize confidentiality and anonymity. This project GM will adapt lessons from other projects to strengthen accountability to communities and identify a range of issues by holding periodic team meetings to discuss any workplace concerns.
50. In setting a up a GM to facilitate resolution of SEAH complaints, the project will be guided the by the following principles:
- a) *Confidentiality*: At all stages of the intervention, the privacy and confidentiality of survivors will be assured, prioritizing the well-being of survivors and that the delivery of services and support will not compromise the privacy or identity of individuals involved.
 - b) *Respect*: Respect of the wishes, dignity and choices of the survivors will be observed at all times and during all stages of any intervention. Survivors will be supported to give their free and informed consent, based on a clear understanding of the facts, implications, risks, and consequences of an action, before information is shared or action is taken.
 - c) *Safety and security*: Awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by SEAH will be sufficiently addressed and factored into any SEAH intervention or initiative.
 - d) *Non-discrimination*: All SEA interventions will be designed to ensure access and the same level of quality of care and assistance for all persons seeking support, or persons affected by SEA, without regard to sex, sexual orientation, gender identity, age, ethnicity, religion, or other status.
51. The project GM will implement a survivor-centered approach to managing SEAH complaints including the use of SEAH victims' referral centres (Annex 4). The focus of GM would be confidentiality to protect the privacy and choices of the victim, and

urgency to preserve evidence and access assistance and care for the victim. For these reasons the complaint is not expected to follow a uniform pattern. The complainant will be free to use any avenue to report including text message, email, phone call, written note, or word of mouth in person to trusted colleague, member of the GM, SEAH service provider, or local CBO or NGO, among others. If the complaint is received by any other person or entity other than the designated SEAH services provider, the case should be referred as soon as possible thereafter to the service provider.

52. The process of assistance will follow the steps below. The person that receives the complaint/report will inform FSRP Project Coordinator immediately. The PC arranges for any required emergency support and care in coordination with the designated SEAH service provider and simultaneously refers the case to the service provider. In the meantime, the service provider contacts (in all cases) the PC to report any SEAH incident to the Bank within 48 hours.

53. The only information to be collected from the person reporting will be:

- demographic data, such as age and gender;
- the nature of the complaint (what the complainant says in her/his own words);
- whether the complainant believes the perpetrator was related to the project; and
- whether they received or were offered referral to services.

54. The project will put in place the necessary mechanisms to address SEAH. The proposed mitigation measures as per the risk level in the current project are as follows:

- Define SEAH requirements and expectations included in the contractual obligations as well as reinforce CoCs that address SEAH in the project locations to cultivate an environment free from SEAH as well as regular dissemination of the CoC to the workers;
- Ensure a GBV specialist is in place to support SEAH risk management measures;
- Develop and deliver information, education, and communication materials for stakeholders to indicate that the project and/area is a SEAH free zone, as well as provide information on SEAH response services (such as hotline numbers and where to seek assistance when needed). Other information to be highlighted includes:
 - (i) No sexual or other favors can be requested in exchange for services;
 - (ii) Project staff are prohibited from engaging in SEAH and this information should be clearly spelt out during training and other forms of communication to the staff;
 - (iii) Any case or suspicion of SEAH should be reported to [hotline number, GM or citizen engagement/feedback mechanism
 - (iv) Information on protection of whistle-blowers; and
 - (v) The range of services available for survivors including healthcare, protection and psychosocial care.

- Develop SEAH prevention policy and response procedures that outline key requirements for reporting cases if they arise, measures to enable safe, ethical, survivor-centered response and disciplinary processes;
 - Train all project staff and workers (where feasible) and integrate understanding of the CoC, SEAH as well as accountability and response framework including the referral processes, responsibilities and reporting in other trainings; and
 - Utilizing the GM developed under the project is possible. however, a separate channel to manage SEAH-related complaints per county will be adopted to enable reporting in a safe, confidential survivor-centric manner. Cases of SEAH can therefore reported to any of the mapped service providers in each county where the survivor feels safe or be reported through the general Project GM – through the suggestion box, or through the GM Hotline Operator, phones calls, emails etc. to be developed). The project GM will ensure all incidents of SEAH reported either through the general GM system that is related to the new project are relayed to the PCU and Bank within 48 hours.
55. Existing SEAH response and prevention activities under ELRP show that Gender-based violence (GBV) is a severe public health issue affecting women and girls in the counties, with Locust infestations, drought occurrence that was coupled with the Covid 19 pandemic in Kenyan communities having significantly increased women and girls' vulnerability to GBV.
56. A report which evaluates the provision of GBV services in ELRP counties in Kenya, by Mary Njeri (a leading GBV consultant) focusing on the counties of Mandera, Wajir, Marsabit, Garissa, Samburu, Isiolo, Meru, Baringo, Kitui, West Pokot, Elgeyo Marakwet, Tharaka Nithi, Embu, Machakos, and Turkana has the following key findings
- (i) GBV services are provided in the target counties, but significant gaps and challenges exist. Key achievements in the provision of GBV services in the target counties include the establishment of safe houses, the recruitment of community health volunteers, and the development of awareness-raising campaigns.
 - (ii) Several challenges affect GBV services, including a lack of resources, inadequate training of service providers, and the stigma associated with GBV.
 - (iii) Locust infestation has further worsened the situation, causing significant food insecurity, loss of livelihoods, and increased poverty levels in the affected communities. These adverse effects have increased GBV cases, including sexual violence, intimate partner violence, and child marriage.
 - (iv) The report recommends strengthening the capacity of GBV service providers and raising community awareness of GBV issues
 - (v) The report presents data on GBV cases reported in each county in 2022, with Mandera, Wajir, and Marsabit having the highest numbers of cases.

- (vi) A pie chart shows that 33% of women and 10% of men have experienced GBV in their lifetime. A line graph demonstrates that GBV prevalence has increased over time, with a prevalence rate of 38% in 2022.
- (vii) Finally, a chart shows the prevalence of GBV by region, with the Coast region having the highest prevalence rate of 47%

57. The main categories of Service Providers identified in the counties include.
- **The Kenya Police:** The Kenya Police play a crucial role in GBV services as they are often the first point of contact for survivors of gender-based violence. They are responsible for receiving reports of GBV cases, conducting investigations, and ensuring that perpetrators are brought to justice.
 - **Kenya Red Cross Society:** The Kenya Red Cross Society provides a range of gender-based services. Violence, including counselling, legal aid, and housing assistance. It also works to raise awareness of gender-based violence and promote gender equality.
 - **National Gender Equality Commission (NGEC):** NGEC is the government agency responsible for promoting gender equality and women's empowerment. They offer a wide range of gender-sensitive services, including counselling, legal aid and economic empowerment programs.
 - **Ministry of Health:** The Ministry of Health provides a wide range of gender services including health care, counselling and support groups. They also work to raise awareness of gender-based violence and promote gender equality.
 - **Non-Governmental Organizations (NGOs):** Several NGOs are providing gender-based violence services in Kenya. These NGOs provide a wide range of services including counselling, legal aid, housing assistance, economic empowerment and health care.

3.3 Support Services

58. Existing support services in the project areas will be accessed through FSRP referral, networking, and in coordination with other actors. It is in the interest of the project team to identify the existing service providers beforehand, discuss modalities of engagement and facilitation and provide a referral pathway for the project beneficiaries, workers and nearby communities. The Project will have a memorandum of understanding (MOU) with the mapped NGOs. The support services, include amongst others:
- Preventative support services where the County CPCU will engage and collaborate with NGOs, civil society, state and non-state actors who during public consultation indicated are involved in providing community awareness sessions and capacity building for the different project actors
 - Provision of easily accessible information on services available to survivors of SEAH;
 - Provision of accessible, effective, and responsive health, social welfare, police, prosecutorial, and other services to redress cases of SEAH;

- Provision of specialized facilities, including support mechanisms for survivors of SEAH; and
- Provision of effective rehabilitation and reintegration programs for perpetrators of SEAH.

Table 2: Prevention and Response Plan for FSRP

	Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
I	Coordination, Networking and Partnership							
	To develop an integrated and comprehensive plan that will focus on the process of addressing SEAH. Hence, the need to form strong alliances with key bodies such as the County Government, the National Governments, the community organizations like WRUA/SAC, the local community leaders.	<ol style="list-style-type: none"> 1) Agree on which stakeholders will constitute the SEAH management team. 2) Develop terms of reference that will guide the SEAH management team. 3) Hold workshops for the SEAH management team. 4) Develop operational guidelines 5) Offer training that will equip the team to engage with the rest of the project team with integrity while inculcating various tools that will deal with SEAH 	<p>First 6 months for Constitution of SEAH management Team and initial training.</p> <p>Follow up training annually which will include sharing of practical experiences.</p>	<p>PCU</p> <p>GBV Consultant</p>	<p>Project Coordinator, SSDS</p>	<p>SEAH Management Team Constituted and functioning as per ToR developed</p> <p>Number of trainings conducted for SEAH management Team</p> <p>Operational guidelines developed</p>	<p>5 trainings, five days each (25 days)</p>	<p>15 counties X 1 million=15.00 million=15.000</p>
	The GBV consultant, SSDS, Social specialist responsible in ensuring that SEAH are regular agenda items in MoALD PCU, both national and county level meetings as it is a key result area that	<p>Include the items below in the Organized regular PCU meetings:</p> <p>SEAH/GBV agenda</p> <p>Reports and updates</p>	<p>Start in quarter one and continuous</p>	<p>PCU</p>	<p>Project Coordinator FSRP</p>	<p>Number of monitoring of project meetings held with SEAH as an agenda item</p>	<p>10 days</p>	<p>800,000</p>

Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
will determine the success of the project	Follow-up monitoring actions.				Percentage of cases/issues/concerns followed up		
2 Mapping out SEAH Prevention and Response Service							
<p>Map out all communities where the sub project are been implemented for referral services for survivors of SEAH</p> <p>Undertake social cultural environmental mapping to identify stakeholders/GBV actors for response mechanism in relation to SEAH contexts</p> <p>Mapping of existing Service providers will be undertaken and those mapped will include CBOs,</p>	<p>Conduct field visits and or remote(desk) review to identify and map the existing services, gap analysis, entry points for survivor assistance, and local actors working on the prevention of and/or response to gender-based violence.</p> <p>Towards achieving this the following will be undertaken:</p> <p>Conduct a desk review of SEAH service providers in hosting counties and communities. Including the prevention and response mechanism</p> <p>Field visits</p> <p>Stakeholder consultations</p>	Before the works start	GBV consultant	<p>Social Specialist, at PIUs and County CPCU</p> <p>SSDS to get reports</p>	<p>The Mapping Report</p> <p>Service provision/providers capacity assessment report?</p>	2 days per county for 26 counties	5,000,000

Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
NGOs, and other civil society organizations.	Analyze the services for survivors available in all project locations and assess their quality as per standards, including health care, psychosocial support, police, and legal/justice services						
<p>Review and update a multi-sectoral SEAH referral pathway(s) in line with the National and County systems</p> <p>The survivors will have a place to go and report. Where confidentiality can be done. It will be multi-pronged where for example, women focal points or champions can report to and have access to service providers ensuring witness protection</p>	<p>Considering the mapped out existing SEAH prevention and response service providers, a referral pathway for service providers will be updated</p> <p>The County CPCU will disseminate the referral pathway/list to stakeholders including service providers who will work with focal points at the community level to support awareness of SEA/SH and dissemination</p> <p>Train focal points and have a clear TOR for their role</p>	<p>Within the first quarter of the kickoff of the work plan</p> <p>To be updated annually and maintained throughout project implementation.</p>	GBV consultant and Social Specialist	National Project Coordinator and County Coordinator	<p>The referral pathway updated at appropriate periods throughout the project year (annually, biannually, etc.)</p> <p>The level of dissemination undertaken (number of stakeholders with access to the updated referral pathways).</p> <p>Number of county/community focal points trained.</p>	Continuous	400,000

	Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
3	Capacity Building							
	<p>Capacity building is aimed at strengthening the ability to handle cases of SEAH effectively and efficiently.</p> <p>The goal is to constitute a team and offer them relevant training that will enable them to share knowledge, detect any behavior that might lead to SEAH, understand laws surrounding SEAH and know the channels of reporting.</p>	<p>Capacity assessment of the implementing agencies, partners before embarking on the trainings so as to understand the gaps and be able to monitor/measure progress from the trainings undertaken over the project duration</p> <p>Provide detailed and comprehensive training on SEAH highlighting its causes, consequences and the management and response to SEAH to county teams and focal points.</p> <p>Offer training for community-based organizations, traditional and faith leaders, media, and other stakeholders on innovative approaches for prevention of, and response to SEAH.</p> <p>Consolidate the teams responsible for effective</p>	<p>Within the first month before the implementation process commences.</p> <p>To be reviewed as need be, for example when a staff exits or when there are notable training needs.</p>	<p>GBV consultant and the Social Specialists at NPCU and CPCU</p>	<p>PCU and county coordinators, SSDS to get all training reports</p>	<p>Number of training sessions and staff trained to provide SEAH related services in the counties.</p> <p>Capacity building assessment report for the implementing agencies and other relevant actors.</p> <p>Number of contracts, CoCs, HR manuals and other safeguarding tools/documents that integrate SEAH</p>	<p>Continuous</p>	<p>5,000,000</p>

	Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
		<p>research, monitoring and evaluation of SEAH programs and services to support generation of evidence to inform decisions.</p> <p>Review the Contractors and consultants' contracts</p> <p>Assess the Human Resource manuals and staff capacity</p> <p>Prepare project code of conduct</p> <p>Appoint an internal focal point in charge of reporting (who might include one in HR dept)</p>						
4	Prevention and Awareness							
	<p>This is aimed at creating an understanding of the magnitude and effects of SEAH and what can be done to prevent such scenarios during and after the project.</p>	<p>Structure and roll out a marketing and communication strategy/campaign to educate and raise awareness about SEAH. This includes appropriate signage at project sites.</p> <p>The development of the communication strategy should involve stakeholders and the</p>	<p>Within the first quarter</p> <p>To be reviewed throughout the project implementation</p>	<p>GBV consultant, and Communication Specialist</p>	<p>NPCU and County Coordinators, SSDS to get reports.</p>	<p>Communication strategy and Stakeholder Mapping Report</p> <p>Number of awareness campaigns/sessions and community discussions</p>	<p>Continuous for all counties</p>	<p>6,000,000</p>

Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
<p>The step is aimed at prevention and early detection of any practices that may lead to SEAH. Helps to eliminate, or address any social, political, cultural tradition and religious factor that gives lee ways to SEAH.</p>	<p>communities where the project is implemented for referral services for survivors of SEAH</p> <p>Mobilize institutions and government bodies to be in the lead of transforming culture and behavior which cause discrimination against women and girls in that community.</p> <p>Involve women men and young boys in developing initiatives that will bring sustainable solution for SEAH through continuous awareness.</p> <p>Create an environment for girls and women to engage in project create forums for women and girls to safely voice their concerns, needs and feedback? This can be integrated as an inclusive and SEAH sensitive feature of the GRM development activities.</p>				<p>held per sub-project location</p> <p>Periodic community engagement reports focusing on awareness creation on SEAH prevention</p> <p>Project locations with separate facilities for women and men and appropriate GBV-free zone signage.</p>		

	Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
		<p>Ensure that SEAH requirements are included in bid documents including the requirement for a Code of Conduct.</p> <p>Ensure that the project locations contain separate facilities for women and men.</p>						
5	Response and Support							
	<p>The main aim is to strengthen the delivery of effective, accessible, and responsive protection, care, and support services to those affected by gender-based violence. This must involve a high level of confidentiality.</p>	<p>Provide funding for GBV service providers considering the challenges identified in the project counties and gaps identified in the capacity assessments</p> <p>Provide dedicated and responsive needs-driven services to survivors of SEAH there is need for special services such as emergency transport facilities in coordination with the existing service providers and actors experienced in this aspect.</p> <p>In reference to mapping report enact a strong, well-coordinated</p>	<p>Across the project life cycle</p>	<p>GBV consultant, SEAH Management Team</p>	<p>National Project Coordinator, SSDS</p>	<p>Number of GBV service providers contracted by the implementing agency (including funding provided).</p> <p>Operational codes of conduct are being signed, understood and adhered to.</p>	<p>continuous</p>	<p>10,000,000</p>

	Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
		<p>and integrated multi-agency response to SEAH. This includes a good structure of referral networks that are in collaboration with community, traditional and religious leaders.</p> <p>With the help of legal personnel, update the legal and institutional framework in harmony with the SEAH need that exists to help victims and survivors of SEAH</p> <p>Identify community-based safe shelters with the right personnel and outreach services for the protection of survivors of SEAH.</p> <p>Enforce the relevant law on the SEAH perpetrators and re-integration in the community to reduce repeat offenses.</p>				<p>Updated and reliable referral pathways in each project county</p> <p>A survey to establish if community that is well informed and are ready to protect women</p> <p>A well-structured legal body specifically dealing with SEAH issues in place both at county level</p> <p>Women and girls who are aware of their rights. This can be established through a survey.</p>		
6	Grievance Management (GM) for SEAH Responsive Reporting							

Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
<p>The purpose for GM is to safe channels for reporting any cases of sexual harassment or sexual exploitation and abuse.</p> <p>The focus is confidentiality to protect the privacy and choices of the victim, and urgency to preserve evidence and access assistance and care for the victim</p>	<p>Review and amend the existing GM to ensure it meets the SEAH needs that currently exist. This should include evaluating the existing entry points (are they safe and reliable, accessible), and establishing protocols for safe and confidential data sharing, collection, and storage.</p> <p>Guide the community and employees on the channels of reporting cases of SEAH and what constitutes sexual harassment as per the guidelines.</p> <p>Outline for the employees the penalties and disciplinary actions that will be taken against anyone that breaches the code of conduct.</p>	<p>Ongoing throughout the project implementation</p>	<p>GBV Consultants and GM focal points</p>	<p>NPCU and County Coordinator, SSDS</p>	<p>GRM features dedicated operating procedures and response protocols to handle SEA/SH allegations</p> <p>Number of sessions held with relevant stakeholders (community members, workers, etc.) on existing GRM</p> <p>Periodic GRM report with sustained effective case management/resolution (e.g. evidence of</p>	<p>Continuous</p>	<p>6,000,000</p>

	Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
						<p>survivors receiving support/services)</p> <p>Number of GRM users who know about and are report confidence in using existing GRM</p> <p>When victims of sexual harassment can easily reach out to report an attempt of action of violence against them and receive a supportive response immediately.</p>		
7	Monitoring and Evaluation							
	Monitoring is aimed at developing a set of key quantitative and qualitative indicators to manage measure and monitor the progress and effectiveness	Develop instruments meant to measure the magnitude of reported cases of SEAH categorized in their various forms, such as child sexual abuse	Takes place throughout the project life	GBV Consultant Third party monitor	PCU and PIU and County CPCUs	Number of instruments that integrate and monitor SEAH	Continuous	5,500,000

Objectives	Activities / Steps to be taken to Address SEAH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (KES)
<p>of the integrated effort to deal with SEAH.</p> <p>It measures how well the policies are being adhered to, any issues that might emerge in regard to SEAH and recommendation to improve any situation that may arise.</p>	<p>Mechanism to measure effectiveness of the various support systems to respond</p> <p>Conduct at least three-time survey to assess: project workers attitudes towards the acceptability of SEAH by gender.</p> <p>Develop mechanisms to measure the impact of Public Education, Awareness Creation and Campaigns conducted by the SEAH teams.</p> <p>From time to time set up process indicators to assess how the project is being implemented.</p> <p>Monitor and account for activities under the National Strategic Action Plan.</p>				<p>Monitoring reports on workers' attitudes, compliance to CoCs,</p> <p>Monitoring reports on SEAH incidence reporting and referral (access to services).</p> <p>How effective is the support and interventions offered to victims of SEAH?</p> <p>How many success stories have been reported in relation to SEAH?</p> <p>Shift in attitude of project workers.</p>		
	TOTAL						31,000,000

4. Conclusions and Recommendations

59. The FSRP shall have zero tolerance to SEAH cases among project workers and shall take proactive steps towards sensitization and prevention. In case of any SEAH cases are reported, have a well-coordinated and integrated multi-agency response mechanism to respond. Have a GM developed under the project with a separate channel to manage SEAH-related complaints to enable reporting in a safe, confidential survivor-centric manner? The Plan is a living document and will be updated as the project implementation unfolds and especially as the subprojects risks and impacts become clearer. The responsibility to implement the Plan rests with the Project Coordination Unit (PCU) at national and county level.
60. It is recommended that the project sets aside resources amounting to about KES 35,000,000 to enable timely implementation of this Plan. The resources cover human, financial and physical.

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ANNEXES

Annex I: Code of Conduct Form for Contractor's Employees/Workers

Company Logo

CODE OF CONDUCT

CONTENTS

<u>1. Introduction</u>	43
<u>2. Core Values</u>	43
<u>4. Equal Employment Opportunity and Other Employment Laws</u>	44
<u>5.1. Gender Based Violence, Sexual Harassment, and Child Abuse/Exploitation Code of Conduct</u>	44
<u>6. Procedures</u>	45
<u>6.1. Getting Help</u>	45
<u>6.2 .Discipline</u>	45
<u>7. Implementation of the Code of Conduct</u>	46
<u>7.1. Method of delivering the code</u>	46
<u>8. Monitoring the implementation of the Code</u>	46
<u>9. Breaches of the Code of Conduct</u>	47
<u>10.0 Code of Conduct Certification</u>	47
<u>13. Declaration by the Managing Director</u>	48
<u>Annex A. Company Gender Based Violence and Child Abuse/Exploitation Code of Conduct</u>	49
<u>Annex B. Manager’s Gender Based Violence and Child Protection Code of Conduct</u>	50
<u>Annex C. Individual Gender Based Violence and Child Protection Code of Conduct</u>	54
<u>Annex D Employer’s Child Protection Code of Conduct</u>	56

1. Introduction

The Code of Conduct consists of two sections: Core Values, and Compliance Program and Guidelines. Our Core Values are part of our heritage and are fundamental to who we are as an organization. These Core Values are the basis for our decision-making. The Compliance Program and Guidelines address some specific areas of concern, either due to the Company emphasis or legal requirements. This code of conduct outline below therefore meets the legal and contract requirements for the proposed project of the

2. Core Values

The following nine Core Values represent the foundation of our Code of Conduct. Although achieving these high standards may be difficult, we nonetheless aspire to uphold them as we live our lives and conduct our business:

Core Values represent who we are and provide, without question, the standard of behavior by which we conduct business, how we treat one another, how we deal with our customers, how we respond to our stakeholders, and how we hold one another and ourselves accountable.

Safety

- The safety of our employees, our stakeholders, and the general public is our responsibility.
- Plan safety into every aspect of our work and relentlessly execute our plan.
- Drive for continuous improvement to create and sustain a zero-incident culture

Honesty

- Be truthful, accurate, and straightforward.
- Be candid and non-deceptive in communication and conduct.

Integrity

- Maintain consistency between our beliefs and our behavior—walk our talk!
- Have the courage to contend boldly for the right and reject firmly that which is wrong.

Fairness

- Endeavor to be reasonable, open-minded, impartial, even-handed, and non-discriminatory in all our dealings.
- Genuinely partner and actively collaborate within and outside the Company.
- Maintain, without deviation, an attitude of sincerity, tolerance, consideration, and assistance toward others, regardless of position.

Accountability

- Accept responsibility for our own actions or inactions and for those whom we supervise.
- Take prompt, constructive steps to correct mistake and defects.
- Promote teamwork by holding one another accountable—of rejecting behaviors inconsistent with this Code of Conduct.

Consideration of Others

- Practice the principles of the Golden Rule.
- Respect the dignity, rights, safety, and personal

Property of others.

- Be open to the ideas and the opinions of others.
- Exercise patience and remain positive under all circumstances.
- Ensure that those whom you supervise are not put in compromising situations.

Pursuit of Excellence

- Consistently apply diligence, perseverance, attention to detail, and good work habits to ensure high-quality projects, and products and excellent customer service.
- Build capabilities through continuous learning, coaching, mentoring, and teaching.
- Never accept complacency or indifference.
- Remain flexible and open to possibilities.

Reliability

- Only make realistic commitments and follow through on the commitments you make.
- Be prompt and responsive in business dealings within and outside the Company.

Citizenship

- Comply with all governmental laws, rules, and regulations.
- Show consideration for the safety and the welfare of everyone, including our natural environment.
- Respond to the impact our work has on the natural by consistently evaluating and improving our efforts so that our projects and processes work in harmony with the environment.
- Cultivate an organization that actively encourages us to be the best of who we are and continuously strive to make a difference in our communities and the world.

3. Equal Employment Opportunity and Other Employment Laws

- Employees will comply with all, state, and local equal employment opportunity laws.
- The Company will employ persons and make employment-related decisions without regard to an individual's race, color, religion, sex, age, creed, ancestry, marital status, sexual orientation, gender identity, disability, medical condition, genetic information, or any other characteristic protected by law.
- The Company is committed to compliance with the Kenya's persons with disabilities PWDs Act and will make reasonable accommodations for qualified individuals with known disabilities. This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.
- It is the Company's responsibility to provide all employees with a workplace free of harassment, intimidation, coercion, and retaliation.

4. Gender Based Violence, Sexual Harassment, and Child Abuse/Exploitation Code of Conduct

Contractor employees, officers, and directors are responsible for conducting themselves so that their actions are not considered sexually harassing, demeaning, or intimidating in any way. They are obliged to create and maintain an environment which prevents SEAH and child

abuse/exploitation (CAE) issues, and where the unacceptability of SEAH and actions against children are clearly communicated to all those engaged on the project, as called for in the Company's Gender based Violence and Sexual Harassment code of conduct. Under the Kenyan law (Sexual Offences Act 2006), sexual harassment is generally defined as either:

1. Unwelcome sex-based conduct that is so severe and pervasive that it creates an intimidating, hostile, or offensive work environment
OR
2. Sex-based conduct by a supervisor or manager that tangibly affects an employee's job—for example, imposition of discipline, or loss of pay or benefits.

Sexual harassment can occur in a variety of forms. It may include:

- (i) Unwelcome sexual advances;
- (ii) Requests for sexual favors;

AND/OR

1. Verbal remarks or physical contact or conduct of an intimate or sexual nature, such as uninvited touching or sexually suggestive comments, that interfere with another person's work performance or that create an intimidating, hostile, or offensive working environment.
2. The Company has zero tolerance for discrimination or harassment of any kind, and employees will be subject to disciplinary action, including termination, for violations.
3. The Company will not tolerate retaliation against anyone who in good faith raises a concern or reports a violation.

5. Procedures

5.1. Getting Help

All directors, officers, and employees have a responsibility to read, understand, and follow our Code of Conduct. Remember, this is only the starting point. Our Code does not attempt to address every situation you might encounter in your job.

So where do you turn for help?

Your first resource is your immediate supervisor to answer your questions or contact a Company resource who can. But, if you feel your situation would make it impossible or uncomfortable to approach your immediate supervisor, you should go to your next level of management, the site Supervisor, or Company's Human Resources manager.

5.2 Discipline

All employees are expected to read, understand, and comply with our Code of Conduct. Violations of law, this Code, and other Company policies and procedures can lead to disciplinary action up to and including termination. Supervisors, managers, and officers can also be subject to discipline if they condone, permit, or have knowledge of illegal, unethical, or other improper conduct and do not take appropriate action.

The Company will not tolerate retaliation against anyone who, in good faith, uses the reports or raises questions regarding potentially illegal, unethical, or improper conduct.

6. Implementation of the Code of Conduct

The implementation of a code of conduct will involve communication of policies and guidelines to all staff and workers, by providing any necessary training to ensure they understand the code. The code will be practiced and promoted by management to lead the way for staff and workers.

The code of conduct will be one of the conditions of employment. A staff or a worker shall be required to sign and commit himself or herself to comply with the code.

7.1. Method of delivering the code

(a) Induction package

Induction training is a chance for existing employees/workers and new employees to review and understand expectations and requirements. The contractor through her representatives and or health and safety team shall perform induction training to all workers. This will happen when the work starts and when any new employee or a worker comes to work on site. Along with a code of conduct, the induction package may include a training and information on applicable work Environment health and safety or any other information that the contractor wish to deliver to new employees or workers.

(b) One-on-one training

A Company representative - such as the Foreman, Headman, site supervisor, HR staff member or trainer - could work through the code of conduct and other requirements and expectations with existing employees or workers during the site meetings which include morning toolbox talks before start of work

(c) Employee handbook

A printed version of Company's employee handbook that will be left in a communal area such as a site office room will provide staff or workers easy access to the code of conduct when required.

(d) Notice boards

A summary version of the full code of conduct can act as a reminder to staff. Different parts of the code can be highlighted in different parts of the site office - for example, signs can be erected in the store about cleanliness, safe access of materials and respect for others.

8. Monitoring the implementation of the Code

(a) Understanding the code

Feedback will be sought from the employees/workers to ensure that they understand the code of conduct and what is expected of them. If they don't fully understand some areas, appropriate training will be provided. For example:

- Physically showing them designated smoking areas
- Verbally give an example of how of how to handle or talk to one another
- Practically show them how to carry out safety procedures, work procedures and or use of Personal protective equipment etc.

(b) Reviewing staff and workers understanding of the code

Review of staff and workers understanding of Company's Code of Conduct by requiring them to complete a survey or questionnaire will be done. The questions will focus on any new sections and particular areas of the code that workers may not fully understand.

The surveys will identify areas of the code that staff may need further training or may be unclear and need to be reviewed. Follow up on the survey to ensure that all staff understand what is expected of them. When they are happy with the new code, they will then sign a document to say that they accept to comply.

9. Breaches of the Code of Conduct.

To minimize conflict if any employee or laborer violates the code, each of them will be asked to sign a document to say that they agree to abide by the code of conduct. This will form grounds to take a disciplinary action. In case of violations:

Code of conduct or safety violation notice(s) shall be issued to any employee, subcontractor, or anyone on the jobsite violating the provisions of the Code, the safety rules or regulations by Responsible Person.

- (i) Any violation of this Code or safety rules can result in suspension or immediate termination.
- (ii) Any employee receiving three (3) written general violations within a six (6) month period shall be terminated.
- (iii) Issuance of a safety violation notice for failure to use fall protection, appropriate PPE provided, or for failure to report a job injury (at the time of the injury) may result in immediate termination, in accordance with health and safety company policy.

10.0 Code of Conduct Certification

As the Contractor's employee and as applicable to my work responsibilities:

- (i). I will deal fairly and ethically with my employer and on behalf in all matters and will at all times
Proactively promote ethical behavior.
- (ii) I will not (a) take for myself personally any opportunities that are discovered through the use of the Contractor's property, information, or position; (b) use the Contractor's property, information, or position for personal gain
- (iii) I will protect Contractors' assets and promote their efficient and legitimate business use.
- (iv) Without exception, I will comply with all applicable laws, rules, and regulations provided
- (v) I will promptly report any illegal or unethical conduct to Contractors' management or other appropriate authorities.

I have read the Contractors Code of Conduct and do certify that:

- I understand the Contractors Code of Conduct.
- I understand that I have a responsibility to ask questions, seek guidance, and report suspected violations of the Code.

- To the best of my knowledge, I am in compliance with the Contractors Code of Conduct.
- I understand that the Company reserves the right to change, rescind, and add to the Contractors Code of Conduct at its sole and absolute discretion and may do so at any time in writing or otherwise.

Employee _____ Signature _____
Date.....
 Name.....
 Job Location/Specification/Designation.....
 Witness signature.....
 Witness Name.....

II. Declaration by the Managing Director

I _____ hereby certify that the above code of conduct represents who we are as a Company. I shall ensure that the practical and professional conduct of our employees and staff are in line with the provisions of this Code of Conduct and that each of them shall be required to individually sign it and ensure compliance. I confirm as a Managing Director that I shall remain in good standing and respect of this Code of Conduct.

Signed by: _____

**Title: Managing Director.
 Contractors Ltd.**

Date: _____

Appendix A. Company SEAH and Child Abuse/Exploitation (CAE) Code of Conduct

Contractors' employees are obliged to create and maintain an environment which prevents SEAH and child abuse/exploitation (CAE) issues, and where the unacceptability of SEAH and actions against children are clearly communicated to all those engaged on the project. In order to prevent SEAH and CAE, the following core principles and minimum standards of behavior will apply to all employees without exception:

1. SEAH or CAE constitutes acts of gross misconduct and are therefore grounds for sanctions, penalties and/or termination of employment. All forms of SEAH and CAE including grooming are unacceptable be it on the work site, the work site surroundings, or at worker's camps. Prosecution of those who commit SEAH, or CAE will be pursued.
2. Treat women and children (persons under the age of 18) with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.
3. Do not use language or behavior towards women or children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
4. Sexual activity with children under 18—including through digital media—is prohibited. Mistaken belief regarding the age of a child and consent from the child is not a defense.
5. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited.
6. Sexual interactions between contractor's and consultant's employees at any level and member of the communities surrounding the workplaces that are not agreed to with full consent by all parties involved in the sexual act are prohibited. This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex – such sexual activity is considered “non-consensual” within the scope of this Code.
7. Where an employee develops concerns or suspicions regarding acts of SEAH or CAE by a fellow worker, whether in the same contracting firm or not, he or she must report such concerns in accordance with Standard Reporting Procedures.
8. All employees are required to attend an induction training course prior to commencing work on site to ensure they are familiar with the SEAH and CAE Code of Conduct.
9. All employees must attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the institutional SEAH and CAE Code of Conduct.
10. All employees will be required to sign an individual Code of Conduct confirming their agreement to support SEAH and CAE activities.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to SEAH and CAE. I understand that any action inconsistent with this Code of Conduct or failure to act as mandated by this Code of Conduct may result in disciplinary action.

FOR THE COMPANY

Signed by: _____

Title: Managing Director Date: 13th October 2017

Appendix B. Manager's SEAH and Child Protection Code of Conduct

Managers at all levels play an important role in creating and maintaining an environment which prevents SEAH and prevents CAE. They need to support and promote the implementation of the Company and Individual Codes of Conduct. To that end, they must adhere to the Manager's Codes of Conduct. This commits them to support and developing systems which maintain a SEAH-free and child safe work environment. These responsibilities include but are not limited to:

Mobilization

1. Establish a SEAH/GBV Compliance Team from the contractor's and consultant's staff to write a Plan that will implement the SEAH Codes of Conduct.
2. The Plan shall, as a minimum, include the
 - a. Standard Reporting Procedure to report SEAH and CAE issues through the project Grievance Mechanism (GM);
 - b. Accountability Measures which will be taken against perpetrators; and,
 - c. Response Protocol applicable to SEAH survivors/survivors and perpetrators.
3. Coordinate and monitor the development of the Plan and submit for review before mobilization
4. Update the Plan to reflect feedback and ensure the Plan is carried out in its entirety.
5. Provide appropriate resources and training opportunities for capacity building so members of the SCCT feel confident in performing their duties. Participation in the SCCT will be recognized in employee's scope of work and performance evaluations.
6. Ensure that contractor, consultant, and client staff are familiar with the proposed project GM and that they can use it to anonymously report concerns over SEAH and CAE.
7. Hold quarterly update meetings with the SCCT to discuss ways to strengthen resources and SEAH and CAE support for employees and community members.

Training

1. All managers are required to attend an induction manager training course prior to commencing work on site to ensure that they are familiar with their roles and responsibilities in upholding the SEAH and CAE Codes of Conduct. This training will be separate from the induction training course required of all employees and will provide managers with the necessary understanding and technical support needed to begin to develop the Plan for addressing SEAH and SEA issues.
2. Provide time during work hours to ensure that direct reports attend the mandatory project facilitated induction SEAH and CAE training required of all employees prior to commencing work on site.
3. Ensure that direct reports attend the monthly mandatory training course required of all employees to combat increased risk of SEAH and CAE during civil works.
4. Managers are required to attend and assist with the facilitated monthly training courses for all employees. Managers will be required to introduce the trainings and announce the self-evaluations.

5. Collect satisfaction surveys to evaluate training experiences and provide advice on improving the effectiveness of training.

Prevention

1. All managers and employees shall receive a clear written statement of the company's requirements with regards to preventing SEAH and CAE in addition to the training.
2. Managers must verbally and in writing explain the company and individual codes of conduct to all direct reports.
3. All managers and employees are to sign the individual 'Code of Conduct for SEAH and CAE', including acknowledgment that they have read and agree with the code of conduct.
4. To ensure maximum effectiveness of the Codes of Conduct, managers are required to prominently display the Company and Individual Codes of Conduct in clear view in public areas of the workspace. Examples of areas include site office, rest, and lobby areas of sites.
5. All posted and distributed copies of the Company and Individual Codes of Conduct should be translated into the appropriate language of use in the work site areas (e.g., Kiswahili).
6. Managers will encourage employees to notify the GM of any acts of threats or violence to women or children they have witnessed or received or have been told that another person has witnessed or received, or any breaches of this code of conduct.
7. Managers should also promote internal sensitization initiatives (e.g., workshops, campaigns, on-site demonstrations etc.) throughout the entire duration of their appointment
8. Managers must provide support and resources to the SCCT to create and disseminate the internal sensitization initiatives through the Awareness-raising strategy under the Plan.

Response

1. Managers will be required to provide input, final decisions and sign off on the Standard Reporting Procedures and Response Protocol developed by the SCCT as part of the Plan.
2. Once signed off, managers will uphold the Accountability Measures set forth in the Plan to maintain the confidentiality of all employees who report or (allegedly) perpetrate incidences of SEAH (unless a breach of confidentiality is required to protect persons or property from serious harm or where required by law).
3. If a manager develops concerns or suspicions regarding any form of SEAH or SEA by one of his/her direct reports, or by an employee working for another contractor on the same work site, s/he shall immediately refer the case to the competent authorities (Police) and, at the same time, report the case to the GM and the SCCT for internal processing according to the established reporting and accountability measures. Always respecting the survivor's choices if a survivor has been identified.
4. Once a sanction has been determined, the relevant manager(s) is/are expected to be personally responsible for ensuring that the measure is effectively enforced, within a maximum timeframe of 14 days from the date on which the decision was made.
5. Managers failing to comply with such provision can be in turn subject to disciplinary measures, to be determined and enacted by the company's CEO, Managing Director, or equivalent highest-ranking manager. Those measures may include:
 - a. Informal warning

- b. Formal warning
- c. Additional Training
- d. Loss of up to one week's salary.
- e. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.

Termination of employment.

6. Ultimately, failure to effectively respond to SEAH and CAE cases on the work site by the contractor's managers or CEO may provide grounds for legal actions by authorities.

I do hereby acknowledge that I have read the foregoing Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to SEAH and CAE. I understand that any action inconsistent with this Code of Conduct or failure to take action mandated by this Code of Conduct may result in disciplinary action.

FOR THE EMPLOYER

Signed by: _____

Title: Managing Director

Date: _____

Appendix C. Individual SEAH and Child Protection Code of Conduct.

I, _____, acknowledge that preventing SEAH and CAE are important. SEAH or CAE activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or even termination of employment. All forms of SEAH or CAE are unacceptable be it on the work site, the work site surroundings, or at workers camps. Prosecution of those who commit SEAH, or CAE will be pursued as appropriate.

I agree that while working on the proposed project, I will:

- Consent to police background check.
- Treat women and children (persons under the age of 18) with respect regardless of race, color, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, birth or other status.
- Not use language or behavior towards women or children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Not participate in sexual activity with children—including grooming or through digital media. Mistaken belief regarding the age of a child and consent from the child is not a defense.
- Not exchange money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior.
- Not have sexual interactions with members of the communities surrounding the workplace and worker’s camps that are not agreed to with full consent by all parties involved in the sexual act. This includes relationships involving the withholding, promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex—such sexual activity is considered “non-consensual” within the scope of this Code.
- Attend training courses related to HIV/AIDS, SEAH and CAE as requested by my employer.
- Report to the SEAH and CAE Compliance Team’ any situation where I may have concerns or suspicions regarding acts of SEAH or against children by a fellow worker, whether in my company or not, or any breaches of this code of conduct.

Regarding children under the age of 18:

- Wherever possible, ensure that another adult is present when working in the proximity of children.
- Not invite unaccompanied children into my home unless they are at immediate risk of injury or in physical danger.
- Not sleep close to unsupervised children unless necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible.
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium

- Refrain from physical punishment or discipline of children).
- Refrain from hiring children for domestic or other labor, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury.
- Comply with all relevant local legislation, including labor laws in relation to child labor.

Use of children's images for work related purposes

When photographing or filming a child for work related purposes, I must:

- Before photographing or filming a child, assess and endeavor to comply with local traditions or restrictions for reproducing personal images.
- Before photographing or filming a child, obtain informed consent from the child and a parent or guardian of the child. As part of this I must explain how the photograph or film will be used.
- Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive.
- Ensure images are honest representations of the context and the facts.
- Ensure file labels do not reveal identifying information about a child when sending images electronically.

I understand that the onus is on me to use common sense and avoid actions or behaviors that could be construed as SAEH or CAE or breach this code of conduct.

I acknowledge that I have read and understand this Code of Conduct and have been explained the implications regarding sanctions ongoing employment should I not comply.

Signed by _____

Title: _____

Date: _____

Appendix D Employer's Child Protection Code of Conduct

To Be Signed by All Employees, Sub-contractors, Sub-consultants, and Any Personnel thereof

I..... agree that during my association with Contractors, I have been sensitized and in accordance with the Employer's Child Rights Protection Policy and/or National law on Child Protection, I must/ shall:

- Treat children with respect regardless of age, race, color, gender, language, religion, political or other opinion, national, ethnic, or social origin, property, disability, relationship, birth, or other status;
- Not inappropriately touch or use language or behavior towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- Not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including encouraging or paying for sexual services or acts;
- Wherever possible, ensure that another adult is present when working in the proximity of children;
- Not invite unaccompanied children into my place of residence or any other secluded place, unless they are at immediate risk of injury or in physical danger;
- Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present if possible;
- Use any computers, mobile phones, video cameras, cameras, or social media appropriately, and never to exploit or harass children or access child exploitation material through any medium;
- Not use physical punishment on children;
- Not hire children for domestic or other labor, which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury or moral decadence;
- Comply with all relevant local and applicable international legislation, including national child protection laws and labor laws in relation to child labor;
- Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures;
- Immediately disclose all charges, convictions, and other outcomes of an offence, which occurred before or occurs during my association with the Employer that relate to child exploitation and abuse.
- When photographing or filming a child or using children's images for work-related purposes, I must:
- Assess and endeavor to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child;

Annex 2: SEAH Reporting Process

The SEAH reporting process is characterized by two cardinal elements namely, confidentiality and urgency. Confidentiality to protect the privacy and choices of the victim, and urgency to preserve evidence and access assistance and care for the victim. For these reasons the complaint is not expected to follow a uniform pattern. The complainant will be free to use any avenue to report including text message, email, phone call, written note, or word of mouth in person to trusted colleague, member of the GM, SEAH service provider, or local CBO or NGO, among others.

If the report is received by any other person or entity other than the designated SEAH services provider, the case should be referred as soon as possible thereafter to the service provider.

The process of assistance will follow the steps below. The person that receives the complaint/report will inform FRSP Project Coordinator immediately. The PC arranges for any required emergency support and care in coordination with the designated SEAH service provider and contemporaneously refers the case to the service provider. In the meantime, the service provider causes (in all cases) the PC to report any SEAH incident to the Bank within 48 hours.

Meanwhile complaint is referred to the SEAH Complaints Team which:

- Reviews the case and collectively agree upon the appropriate actions to be taken and sanctions, if any.
- Refers the case to the police as appropriate and according to the law
- Assigns the appropriate 'Focal Point' to implement the actions—with the assistance of the SEAH Services Provider—in accordance with their employment contract and the appropriate code of conduct if applicable.
- Upon resolution, the Focal Point and SEAH Services Provider advise the survivor that it has been resolved, who in turn advise the GM operator.
- The GM operator notes the resolution and closes the case.

Annex 3: SEAH Treatment and Counselling Procedures

Note: These SEAH Treatment and Counselling Procedures should not be used by anyone except a trained and certified counsellor or medical service provider. Moreover, these are only a sample and should be interrogated further before use.

It is recommended that the Survivor-Centered Approach (SCA) be used in counseling SEAH survivors. The SCA aims at creating a supportive environment in which a survivor's rights are respected and in which the survivor is treated with dignity and respect. This approach helps promote a survivor's recovery and empowers them to make decisions about possible recovery interventions.

The SCA is considered essential for the following reasons:

- To protect survivors from further harm
- To provide survivors with the opportunity to talk about their concerns without pressure
- To assist survivors in making choices and in seeking help if they want help
- To cope with the fear that they may have about negative reactions (from the community or their family) or being blamed for the violence
- To provide basic psychosocial support (PSS) to the survivor
- To give back to the survivor the control they may have lost during the SEAH incident

The traumatic states are formed of three dimensions²: emotions, thoughts, and deeds. Therefore, needs of women come from these three recovery domains: emotional awareness, cognitive autonomy, and acting in/with autonomy. These domains are the focus of counselling in SCA. The domains are as follows³:

I. Emotional awareness

Psychotherapeutic hypothesis number one is that emotions are one of the major blocks / barriers of women to move out of the violent situations or to be able to overcome trauma from the past. Therefore, to support women on their way to autonomy, step one is work on women's emotional awareness through identified steps:

- recognizing one's own emotions
- naming emotions (fear, guilt, shame, helplessness, low self-esteem, etc.)
- letting emotions out (crying, rage expressing, etc.)
- expressing emotions verbally (talking about her emotions)
- emotional independence (process of controlling emotions)
- information about trauma phases (learning through experience of others)
- awareness of one's victim role (learning about conditioning of emotional states)

² Lepa Mladjenovic (nd) Counselling service for women with trauma of violence.

³ Ibid.

2. Cognitive autonomy and justice

Psychotherapeutic hypothesis number two is that not only emotions block the changes, but also rational concepts women have about themselves. These concepts are constructed by patriarchal society as well as family model a particular woman lived in. Therefore, to support women on her way to autonomy, step two is work on the woman's own concepts of herself through identified steps:

- awareness of the violence problem (enough to be able to talk about it)
- understanding male-female patriarchal conditioning (enough to know she is not guilty)
- understanding wheel of violence (experience of others structured contributes to cognitive clarity of her own situation)
- positive valuing oneself
- safety plan made (in case a woman is still in danger)
- informed about her rights (information of one's own rights encourages self-control)
- take responsibility for her condition of life (leaving the role of victim)

This dimension as well includes need for justice. Sometimes a long period of time in injustice has been exercised upon her. Need for justice includes:

- information about her rights
- information how to achieve justice
- support in actual legal process

3. Acting in/with autonomy

The post traumatic behavior also means living in silence and non-doing. Therefore, third aim of counseling is supporting women to act toward the responsibility for their own change by:

- ending silence (when she asked for support, she already broke the silence)
- ending non-doing (breaking the logic of the role of the victim)
- deciding according to her needs and wishes (starting a process of taking control of her life)
- acting according to her needs/wishes (instead of obeying the wishes/needs of others)
- using her own support system (her own healthy/positive characteristics)
- using friends that can help her (using all the means to resolve her situation)
- using institutions that can support her as means to her autonomy

Acting in autonomy means living in safe spaces. This dimension implies need for safety. Need for safety includes:

- acting according to safety plan (in case a woman is still in danger)
- moving to safe houses (shelters)
- using legal system, if needed, as means to her autonomy
- exercising legal measures, if they exist, to move out the perpetrator

Counseling service works with women dealing with violence in family, sexual violence, war violence and violence through cultural pressure on women. Whatever the types of violence women experience, the aim is to encourage women to take control of their life situations and take responsibility to overcome violence, move toward justice and become responsible citizens. The counselors do not decide whether women shall leave violence situations. The aim of counseling and advocacy is to stop violence and not relationships. Experience shows that many women (must) continue to live in the same/similar living conditions as before.

Annex: 4: Sample of GBV Referral Centers and Service Providers in the Counties and National Government

National Service Providers

Organization	Address	Contacts
1. KNH (Gender Based Violence Recovery Center GBVRC)	Old KNH between Orthopaedical Clinic and Dental Clinic P.O.BOX 20723-00202, Nairobi	Tel:020-2726300-9 Ext.43136, 44101 Cell:0722-829500/1/2, 0733-606400 Email: knhadmin@knh.or.ke www.knh.or.ke
2. Kayole 2 Sub District Hospital	Kayole opposite DOs offices	Tel:020-231805 Cell:0721-991 638
3. Riruta Health Center	Kawangware Opposite Dagorretti CDF offices	Cell 0712:708 020 0722:984 189
4. Jericho Health Center	Jericho Estate near shopping Centre	Cell:0721-279402
5. The Nairobi Women's Gender Based Violence Recovery Center (GBVRC)	Hurlingham Medicare Plaza, Argwings Kodhek Road	Tel:020-726821/4/6/7 Email: Nairobiwomenshosp@africaonline.co.ke www.gvrc.or.ke
6. Mbagathi District Hospital	Ngumo estate ,off Mbagathi Road P.O. BOX 40205 Nairobi	Tel:020-2724712
7. Association of Media Women in Kenya (AMWIK)	Wendy Court, Hse No 6 David Osieli, Rd, Westlands P.O. BOX 10327-00100, Nairobi	Tel:020-04441226 Email:info@amwik.org www.amwik.org
9. Center for the rehabilitation and	Convent Drive, Lavington, off Isaac	Tel:0203860640 Cel:0720-357664 Tel:020-2505903

10. education of abused Women(CREAW)	Gathanju Road (100 meters form Lavington Green) Kibera Satellite Office Kibera Drive, DO's Compound Kibera, Nairobi	
11. Dolphin Anti-Rape and AIDS Control Outreach		Cell:0733-963283 Dolphin2002ke@yahoo.com
12. Coalition on Violence Against Women(COVAW)	Valley Arcade, Valley Field Court House no 1	Tel:020-80400011 Cell:0722 594 794/0733 594 794 Info:@covaw.or.ke www.covaw.or.ke
14. Girl Child Network	AMREF KCO- Wilson airport off Langata Road	Tel:+254-20-604510 +254-20-607137
15. The Cradle	House 2, Adj Wood avenue Apartments, Wood Avenue Kilimani	Tel:+254(0)203874575/6 Cell:0722 201875 Email: info@thecradle.or.ke
16. Wangu Kanja Foundation	P.O.BOX 12608-00100 Nairobi Kenya	Tel:0203680000 Cell:0722-790404 Email:info@wangukanjafoundation.org
17. Women Challenged to Challenge(WCC)	APDK offices, Waiyaki way opposite ABC place P.O BOX 10593-00100 Nairobi	Tel:020-4452034 Cell:0725 868450
18. Women's Empowerment Link(WEL)	Muringa Road/ Elgeyo Marakwet Junction ,off Ngong Road opposite Red	Tel:020-3864482/97 Cell:0711-901132/0737-286 889 Email: info@wel.or.ke http://www.wel.or.ke

	Cliff gardens Kilimani P.O BOX 22574-00100, Nairobi	
19. Women's Rights Awareness Programme (WRAP)	Next to Mathari Hospital	Tel:020-2050148 Cell:0722-252939 Email: info@wrapkenya.or.ke www.wrapkenay.or.ke
20. Moi Teaching and Referral Hospital GBV Recovery Centre	Moi Teaching and Referral Hospital P O Box 3 - 30100, Eldoret	Cell Phone: 0706390391/0722201277 Email: ceo@mtrh.go.ke / directorsofficemtrh@gmail.com

Wajir County GBV Service Providers

Organization	Address	Contacts
21. County Department of Education, Social & Family Affairs (Gender & Women Empowerment Section)	All the 6 sub-counties (Wajir South, Wajir North, Eldas, Tarbaj, Wajir East and Habaswein) in Wajir	P.O.BOX 9-70200, Wajir County
22. Ministry of Health- Level 4 hospital		
23. Kenya National Commission for Human Rights (KNCHR) and Human Rights	All the 6 sub-counties (Wajir South, Wajir North, Eldas, Tarbaj, Wajir East and Habaswein) in Wajir	North Eastern Office-Wajir. Address: Airstrip Road/Public Works P.O Box 363-70200 Wajir
24. The Kenya Red-Cross society- Wajir Branch	All the 6 sub-counties (Wajir South, Wajir North, Eldas, Tarbaj, Wajir East and Habaswein) in Wajir	Location: Next to Wajir Stadium. Contact: 0724 474 194.
25. Arid Lands Development Focus, Kenya (Aldef-Kenya)	4 sub-counties (Wajir North, Eldas, Tarbaj, Wajir East)	ALDEF KENYA P.O BOX 449-70200 WAJIR aldefpm@gmail.com Along Airport Road, opp to AIC Church.

26. Wajir South Development Agency (WASDA)	2 sub-counties (Wajir south and Habaswein)	Wajir Office Diif Road P.O.Box 209 – 70200. E-mail: info@wasda.or.ke
27. Wajir County Commissioners Officer under the Ministry of Interior and Coordination of National Government	All the 6 sub-counties (Wajir South, Wajir North, Eldas, Tarbaj, Wajir East and Habaswein) in Wajir	Opposite Wajir Plaza Building,

Marsabit County

Organization	Address	Contacts
1. County Department of Tourism, Culture Gender and Social Protection.	All the 4 sub-counties Saku, Moyale, North Horr, Laisamis	P.O.BOX 100-60500, Marsabit County
2. Saku Accountability Forum	Saku but serves all counties	http://sakuaccountabilityforum.blogspot.com ..qorqorti@gmail
3. Marsabit Women Advocacy Development organization. MWADO	All the 4 sub- Saku, Moyale, North Horr, Laisamis	P.O. Boxes 102-60500 Marsabit .
4. Community initiative and facilitation Assistance (CIFA)	4 sub-counties Saku, Moyale, North Horr, Laisamis	CIFA KENYA P.O BOX 364-60500 MARSABIT
5. Marsabit Level 4 hospital trauma centre	Serves all sub counties	Marsabit level 4 Hospital
6. Pastoralists women for health and Education	All 4 sub counties in Marsabit	pastoraliststwomentheducation@yahoo.com
7. Marsabit County Commissioners Officer under the Ministry	All the sub-counties	County Commissioners Building, All sub counties headquarters

of Interior and Coordination of National Government		
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Turkana County

Organization	Contact Person	Contacts
1. County Department of Tourism, Culture Gender and Social Protection.	Project Officer	Phoebe Kaaman
2. CARITAS (Catholic Diocese, Lodwar)	Psychosocial Support Officer	Hildah Ebei
3. Psychosocial Support Services - Wellness Centre	Psychosocial Support Officer	Wycliffe Lolepo
4. Clinical Services – Wellness Centre	Registered Nurse	Shadrack Elim
5. Legal Services – Wellness Centre (linkage with the police)	County Commissioner	Muthama Wambua
6. World Vision-Ke	Project Officer	Annette Koech
7. International Rescue Committee	Project Officer	Belynder Jepchirchir
8. Kenya Red Cross	Project Officer	Emily Gideon

Garissa County

Organization	Contact Person	Contacts
9. County Department of Tourism, Culture Gender and Social Protection.	Project Manager	Fatuma Maalim
10. Women Education and Health for	County Director	Hudson Mwangi

Development (WOHED)		
11. SDFGA	Regional Project Coordinator	Moses Ouma
12. National Council for Population Development	Manager	Sarah Muasya
13. Refugee Consortium of Kenya	Programme officer	Fesal Warsame
14. The Kesho Alliance	Programme Officer	Abdishukri Jelle
15. Muslims for Human Rights (MUHURI)	AOI	John K. Marete
16. National Government of Administration officers (NGAO)	Founder	Mulibo Idle
17. Girl Concern organization	Coordinator	Amran Ali Gabow
18. Garissa Rural Water and Sanitation Company	Hydrologist	Francis M. Maina
19. OPPP	SPPC	Victor A. Asenga
20. Ministry of Labour	Labour Officer	Adan Hassan
21. Haki na Sheria Initiative (HIS)	Programme Officer	Bare Adan
22. Action Aid	Coordinator	Yussuf Abdi
23. NACADA	Programme Officer	Sarah Kerubo Meshack
24. Gender Department	Deputy Director	Ahmed M.Abdi

GBV/SEA information

Support Agency	Emergency Telephone Numbers
Children's helpline	116
Healthcare Assistance Kenya(HAK)	1195
Police Hotline	911/112/999
Toll free Police GBV Line	0800 730 999
Gender Violence Recovery Center (Nairobi Women's Hospital)	Toll Free line 0800720565 Or 0719638006
Red Cross Ambulance Services Red cross Emergency Toll Free Line	0700395395, 0738395395 1199
Ministry of Education offices(countrywide)	Sub-County, County, Reginal and National offices
Teachers Service Commission offices (Country wide)	TSC offices at Zonal(CSOs), Sub county, County, Regional and National Levels
Gender Desks in Police Stations	All Police Stations countrywide have Gender Desks. Ask for one whenever you visit a police station
Children's Department Offices	Children's Department has offices at Sub county, County and regional level
Counselling Units in all Hospitals	All Hospitals countrywide have Counselling units