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THE NATIONAL TREASURY AND ECONOMIC PLANNING

KENYA COVID-19 RECOVERY

**SUPPORTING ACCESS TO FINANCE AND ENTERPRISE
RECOVERY (SAFER) PROJECT**

GENDER-BASED VIOLENCE ACTION PLAN

MARCH 2023

Acronyms

Acronym	Definition
AMFIs	Association of Micro Finance Institutions CBFIs Community Based Financial Institutions
CBK	Central Bank of Kenya
CGS	Credit Guarantee Scheme
CLF	Centralized Liquidity Facility
DOSH	Directorate of Occupational Safety and Health
ESF	Environment and Social Framework
FGD	Focus Group Discussions
ESS	Environment and Social Standard
FSSP	Financial Sector Support Project
GBV	Gender-based Violence
GDP	Gross Domestic Product
ILO	International Labor Organization
KIBT	Kenya Institute of Business Training
KII	Key Informant Interviews
KIE	Kenya Industrial Estates
KIRDI	Kenya Industrial Research and Development Institute
KNBS	Kenya National Bureau of Statistics
KBA	Kenya Bankers Association
LMP	Labor-Management Procedures
MoITED	Ministry of Industry, Trade and Enterprise Development
MSMEs	Micro, Small, and Medium Enterprises
MFB	Micro-finance Banks
MSEA	Micro and Small Enterprises Authority
NGEC	National Gender and Equality Commission
NT	National Treasury
OHS	Occupational Health and Safety
PCC	Project Coordination Committee
PFM	Public Finance Management Act
PwDs	Persons With Disabilities
SACCO	Savings and Credit Co-operative Society
SASRA	Sacco Societies Regulatory Authority
SAFER	Supporting Access to Finance and Enterprise Recovery
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan
OSHA	Occupational Health and Safety Act
WHO	World Health Organization
WIBA	Work Injury Benefits Act

Definition

Gender-based violence (GBV) is 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. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm.

WB defines Sexual Exploitation and Abuse (SEA) as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. The abuse of such power may include wrongful gains such as profiting monetarily, socially or politically from the sexual exploitation of the weak in society. In the projects financed by the WB sexual exploitation occurs when access to or benefit from Bank financed goods, works, non-consulting services or consulting services is used to extract sexual gain.

Sexual Abuse (SA) is defined by the WB as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment (SH) 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.

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1 INTRODUCTION

The project will ensure systems to address and prevent Gender Based Violence that includes Sexual Exploitation and Abuse, Sexual Harassment exacerbated/created by the project are put in place by establishing and implementing a Gender Based Violence (GBV) action plan to support activities under the implementation of the National Treasury.

Gender Based Violence (GBV (SEA/SH)) affect both men, women and children but mostly affects women and girls due to cultural norms and beliefs that leave women marginalized and have little or no power to make important decisions about their lives.

Through their Environmental and Social Management Systems, the Apex Financial Institutions and the Participating Financial Institutions will be expected to have in place institutional GBV including Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Policies in place that will provide mitigation measures against any form of GBV (SEA/SH) under the project, but most importantly prescribe a referral pathway for survivors to access services when required.

This GBV (SEA/SH) Action Plan will focus of National Treasury to ensure that there are systems in place to management any Sexual Harassment and Sexual Exploitation risks under the project.

1.1 Project Description

Micro Small and Medium Enterprises (MSMEs) play a critical role in accelerating economic development, investment as well as the creation of employment opportunities in the country. According to the 2020 Economic Survey, MSMEs constitute about 98 percent of all businesses in the country, create 91percent of the jobs annually and contribute 34percent of the Gross Domestic Product (GDP). However, most of these enterprises experience limited access to credit partly because of the perceived risk by financial institutions. The situation has been worsened by the impact of COVID-19 pandemic and requires immediate interventions.

The objective of the Supporting Access to Finance and Enterprise Recovery (SAFER) project is to increase access to financial services, enhance the capabilities, and support the post-Covid-19 recovery of MSMEs in Kenya. The project seeks to address market failures in the provision of finance to MSMEs, which have been exacerbated by the negative impact of COVID-19. The project contributes to the implementation of the third element of the 8-Point Economic Stimulus Program unveiled by President Kenyatta on 23rd May 2020. This element focuses on enhancing liquidity to MSMEs through provision of affordable credit in an efficient and structured manner.

1.2 Project Component

The project has three components, namely:

- a. Innovation and Liquidity support to MSMEs through Community Based Financial Institutions and digital channels
- b. De-risking lending to MSMEs; and
- c. Technical assistance to build resilience

1.2.1 Component 1: Innovation and Liquidity support to MSMEs (US\$ 55 million)

This component aims to provide liquidity support to MSMEs through regulated financial intermediaries (especially regulated retail lending financial institutions that have limited liquidity) with a focus on MSME banking, including those innovating with digital channels (hereinafter referred to as participation financial institutions (PFIs)). In addition, support will target MSMEs that were previously financed but are now facing constraints in addition to those that are considered bankable but have not been able to access credit. The indicative size of loans to individual micro-enterprises will range between KES7,000 and KES 150,000 and for small enterprises will range between KES150,001 and KES 250,000. Tenor for microloans is expected to not exceed 18 months, and for small loans to not exceed three years. Maximum grace period of six months may apply for both micro and small loans. These aspects will be further defined in the project operations manual. This component will have two windows: window 1 (US \$25million) and window 2 (\$ 30 million). Window 1 will provide lines of credit to MSMEs through Savings and Credit Co-operative (SACCOs) and Micro Finance Banks through an apex institution that will wholesale the lines of credit and in line with government policies and regulation. The apex institution will be an entity, which may include a financial intermediary, identified by the National Treasury. Window 2 under this component, which will also be managed by the apex institution, will help drive innovation targeting informal sector MSMEs by leveraging digital channels to extend offering by PFIs to micro and small firms.

1.2.2 Component 2: De-Risking Lending to MSMEs (US\$ 30 million)

This component aims to unlock lending to MSMEs during the COVID-19 crisis and beyond to support recovery and growth of enterprises. This component would ramp up support to the partial credit guarantee scheme (CGS) that has been set up by The National Treasury as an emergency COVID-19 response measure both in the interim and support the establishment and capitalization of the Credit Guarantee Company (CGC). The CGC will be established to operate according to the Principles of Public Credit Guarantee Schemes as a sustainable mechanism of de- risking MSMEs.

1.2.3 Component 3: Technical Assistance to Build Resilience (US\$ 15 million)

This component will provide technical assistance to build resilience capacity of the MSME finance ecosystem beyond the lifecycle of SAFER. During the life of the Project, the component will support NT, CBK, SASRA and PFIs in the delivery of Components 1 and 2 and ensure overall growth of the MSME lending market.

(a) Sub-Component 3a: TA to NT in setting up the Credit Guarantee Company (CGC) (US\$5 million).

Support to the CGC will include support to CBK to develop prudential regulations for the company. Once the CGC has been established, the project will provide support to build its operational capacity to ensure it effectively delivers its mandate.

(b) Sub-Component 3b: TA to Participating Financial Institutions (PFIs) (US\$ 2 million).

This sub-component will support PFIs (SACCOs, MFBs and financial intermediaries involved). The support will target strengthening of governance arrangements, risk management

capacity, business models, and operational efficiency. The majority of the SACCOs and MFB, especially the smaller ones, face numerous challenges including limited staff capacity with limited funds to invest in capacity building.

(c) Sub-Component 3c: Technical Assistance to financial sector regulators to strengthen the regulatory environment and enhance the financial infrastructure (US\$ 6 million)

This sub-component will support follow-on TA activities related to strategic initiatives started under the Kenya Financial Sector Support Project (FSSP) that are tied to underlying structural weaknesses holding back improved financial intermediation and improvement in liquidity distribution and asset-liability management (ALM). These activities will include: the implementation of a shared digital services platform for Saccos (i.e., SACCO Central initiative by SASRA), which will also establish a mechanism for a centralized liquidity facility similar to the inter-bank market to aid liquidity distribution and asset-liability management in the SACCO sector; implementation of the informal sector micro pension scheme by NT, and added support for the central securities depository (CSD) initiative by CBK.

(d) Sub-Component 3d: This component will also support Project Management by NT (US\$ 2 million)

The objective would be to provide resources for: (i) workshops and outreach to facilitate diffusion and replication of lessons and promising innovations from the project, (ii) monitoring and evaluation (M&E) analyses to ensure the implementation and sustainability of the Project's activities, (iii) develop environmental and social operational and training manuals for PFIs and MSMEs; and (iii) project implementation support, through key functions forming part of the Project Implementation Unit (PIU).

This subcomponent will finance the design and implementation of an overall Project communications strategy, information disclosure, and dissemination tools to inform stakeholders on the Project's progress and facilitate the replicability of success stories. These will support the Project through a demonstration effect and contribute to mobilizing added private capital and broader capacity building. Finally, this subcomponent will support the establishment of the Project Implementation Unit (PIU), which will be responsible for the day-to-day management of the project, with a multilayer implementation and oversight structure. The PIU would consist of NT staff and consultants/experts that would need to be hired to boost PIU capacity. The core PIU staff will include a Project Coordinator, a Procurement Specialist, a Project Accountant, and an M&E consultant. Since the social and environmental risks are deemed to be substantial, the PIU will also recruit a full-time environmental and social (E&S) safeguards consultant.

1.3 Project Activities

a) Under Component 1 the project will focus on the following activities:

- Identify an Apex Institution to channel lines of credit to MSMEs
- Work with the Apex Institution to identify appropriate SACCOs and Micro Finance Banks through which credit lines will be channeled to MSMEs
- Work with the Apex Institution to drive innovation targeting informal sector MSMEs

This component will be implemented an Apex Financial Institution, who will work with participation Financial Institutions

b) Under Component 2 the project will carry out activities as follows:

- Establish a Credit Guarantee Company (CGC) to operate credit guarantee schemes
- Build the systems and capacity for the CGC
- This component will be implemented by National Treasury

c) Under component 3 the project will:

- Provide Technical Assistance to the CGC to operationalize the institution to lead in robust credit guarantee schemes, especially for MSMEs in Kenya
- Provide Technical Assistance to Participating Financial Institutions (PFIs)
- Provide Technical Assistance to financial sector regulators
- Support the project management at the National Treasury (NT) including developing a project communication strategy, setting up a project implementation unit (PIU), and resourcing it, among others.

This Component will be implemented by NT and the selected Apex financial institution.

2 KENYA COUNTRY CONTEXT

2.1 Kenya Gender Based Violence Prevalence Rates

The 2014 Kenya Demographic and Health Survey indicated that about one in four women reported physical or sexual violence from a partner in the 12 months before the survey. Overall, about 41% of women reported having experienced physical or sexual violence from their husbands or partners in their lifetime. About two-fifths of those women reported physical injuries from the violence.¹

A similar proportion of men aged 15-49 (44%) report that they have experienced violence since age 15, but fewer (12%) have experienced it in their adult life. Men rarely report that wives or partners are the perpetrators of the violence.

Sexual violence in Kenya can begin from a young age. US-AID notes in the 2008 Kenya Demographic and Health survey that 12% of women aged 15-49 state that their first sexual encounter was forced. Furthermore, UN-Habit stated that out of sixty-six women they interviewed who had admitted to having been sexually abused eleven women reported that they had been abused as children. Overall, two thirds of these women were abused by somebody they knew: 36% by a family member and 27% by a neighbor. It was noted that women who experience sexual abuse as children are more likely to suffer from all forms of abuse when they reach adulthood.

2.2 Legal Framework for GBV (SEA/SH) in Kenya

The Constitution of Kenya creates a platform for gender equality and non-discrimination. Article 10 of the Constitution is on the National Values and Principles of governance. It highlights such principles as equality, equity, inclusiveness and non-discrimination. These principles provide an anchorage for gender equality. Further, Article 27 (1) provides that every person is equal before the law and has the right to equal protection and benefit; Article 27 (3) provides that women and men have the right to equal treatment including the right to equal opportunities in political, social, economic and cultural spheres. The Constitution also outlaws discrimination on any basis including, pregnancy, race, sex, marital status, health, ethnicity or social origin, colour, age, disability, religion, conscience, belief, culture, dress, language or birth in Article 27 (4). To realize these ideals, the Constitution in Article 27 (6) requires the government to take legislative and other measures including affirmative action to redress disadvantages suffered by individuals and groups because of past discrimination. Article 27 (8) requires that not more than two thirds of the members of elective or appointive bodies are of the same gender.

Figure 1 below presents the legislation, policies and standards Kenya has made significant progress with regards to the development of standards and guidance around addressing GBV (SEA/SH) and providing support to its survivors. Government of Kenya (GoK) has developed several laws which are relevant to addressing GBV (SEA/SH), including expanding the criminalization of abuse, and an explicit statutory duty by the police and identified government departments to ensure that survivors are provided with medical services and protection.

¹ 2014 Kenya Demographic and Health Survey

At the national policy level, a number of standards have been developed, such as the National Policy for Prevention and Response to Gender Based Violence (2014) which outlines a strategy to facilitate a multi-sectoral approach to addressing GBV (SEA/SH) through prevention and response interventions; the National Guidelines on the Management of Sexual Violence (2014), which details the management of sexual violence and outlines the steps for the treatment of sexual violence survivors, including the preservation of evidence and issues of psycho-social support; and the National Monitoring and Evaluation Framework towards the Prevention of and Response to Sexual and Gender Based Violence in Kenya (2016) which sets out indicators for monitoring and evaluation of the different sectors supposed to prevent and respond to sexual violence.

Various standards have been developed at the national sectoral level, such as the National Health Sector Standard Operating Procedures on Management of Sexual Violence in Kenya 2014 which outlines the minimum procedures for the management of GBV (SEA/SH) in the health sector and related referral mechanisms for psychosocial, legal, and other social support services; however, the roll-out of standards and procedures articulated at the national level remains limited at the county level.

A recently established County Government Policy on Sexual and Gender Based Violence, 2017 and its accompanying Model Legislative Framework on Sexual and Gender Based Violence for County Governments launched in November 2017, provide a framework to support the implementation of laws, policies and, programmes for prevention and response to SGBV (SEA/SH) for county governments, and help the development of a County Sexual and Gender Based Violence Act setting out each county's commitment. It is important to note that the policy specifically refers to the need to "ensure that the framework is actionable, well-coordinated and sufficient resources are allocated for its implementation at County level" (NGEC, 2017: 13).

While loopholes and gaps remain in terms of the full comprehensive coverage of the legal framework there is an impressive and relatively progressive framework in place to hold duty bearers and the state accountable if standards are broadly not upheld.

2.3 International Treaties

Kenya has ratified and subscribes to many of them including:

- a) the Universal declaration of Human Rights (UDHR, 1948),
- b) the International Covenant on Civil and Political Rights (ICCPR, 1976),
- c) the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW, 1979),
- d) the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984),
- e) the United Nations Convention on the Rights of Child (CRC, 1989),
- f) the Beijing Platform for Action (1995),
- g) UN Resolution 1325 (2000), the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (2000), T
- h) he ILO Convention 182 on the Worst Forms of Child Labor; and
- i) The Optional Protocol on the Convention of the Rights of the Child on Child Trafficking, Child Prostitution and Child Pornography.

At the regional level, the normative framework includes instruments such as:

- a) the Protocol to the Africa Charter on Human and Peoples’ Rights on the Rights of Women in Africa (Maputo Protocol, 2003),
- b) the Solemn Declaration on Gender Equality in Africa (2004),
- c) the International Conference of the Great Lakes Region Protocol; and
- d) The African Charter on the Rights and Welfare of the Child.

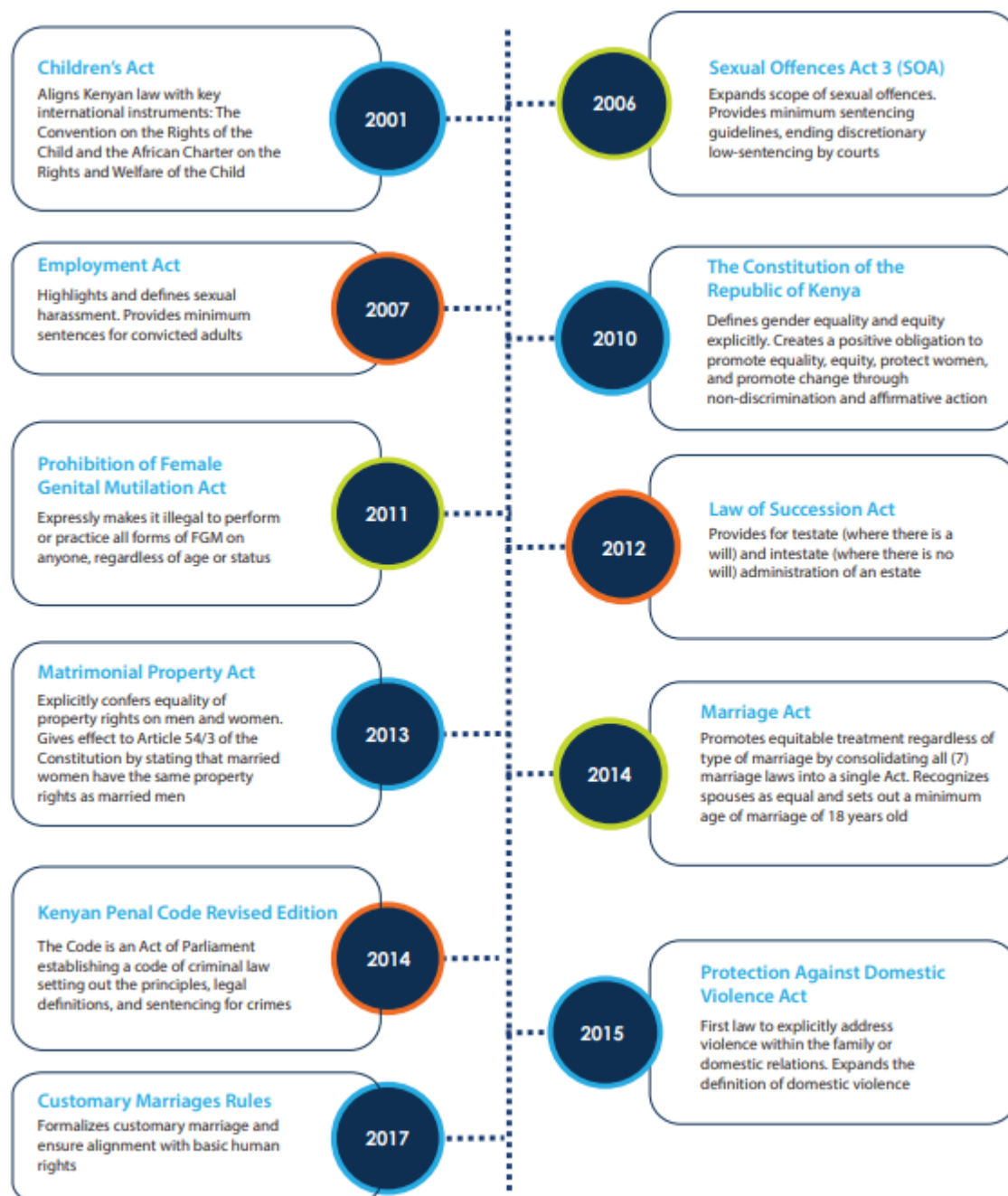


Figure 1 : Kenya Legal Framework for Gender Based Violence

3 CATEGORIZATION OF GENDER BASED VIOLENCE/SEXUAL EXPLOITATION AND ABUSE/ SEXUAL HARASSMENT

3.1 Background

The WB Guidance Note on GBV describes GBV 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.’ GBV occur in a variety of ways, including through the infliction of physical, mental, and sexual harm or suffering threats of such acts, as well as coercion and other deprivations of liberty, such as early or forced marriage, economic abuse and denial of resources, services and opportunities, trafficking and abduction for exploitation, or Intimate Partner Violence (IPV) perpetrated by a former or current partner.

The WB defines SEA as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. This includes, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed goods, works, non-consulting services or consulting services is used to extract sexual gain. Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual Harassment (SH) is understood as unwelcome sexual advances, requests for sexual favours, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between personnel/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that agency policies and staff training can include specific instructions on the procedures to report on both. Both women and men can experience SH.

The Kenya National Policy on Prevention and Response to Gender Based Violence (2014) describes forms of GBV (SEA/SH) are sexual violence, physical violence, emotional and psychological violence, harmful traditional practices, trafficking in persons and socio-economic violence.

Each of the GBV forms has manifestations in several types and this list is by no means exhaustive:

- a) Sexual Violence: Rape, attempted rape, defilement, incest, sexual abuse, sexual exploitation, forced prostitution, sexual violence as a weapon of war and torture and trafficking for sexual exploitation.
- b) Physical Violence: This includes physical assault, human trafficking and slavery.
- c) Emotional/Psychological Violence: Verbal abuse, insults/humiliation, isolation, sexual harassment, confinement and intimate partner violence all fall under emotional/psychological violence.
- d) Harmful Traditional Practices: These include Female Genital Mutilation (FGM), Early Marriage, Forced Marriage, Infanticide and/or Neglect, widow inheritance and disinheritance.
- e) Socio-Economic Violence: This manifests itself through discrimination and/or Denial of Opportunities and Services, Social Exclusion/Ostracism based on gender, Obstructive Legislative Practice, Wife/Spouse Inheritance and Bigamy.

The WB Guidance Note defines four key areas of GBV risks:

1. SEA - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion,
2. Workplace sexual harassment - unwanted sexual advances; requests for sexual favours, sexual physical contact,
3. Human trafficking - sexual slavery, coerced transactional sex, illegal transnational people movement; and
4. Non-SEA - physical assault, psychological or physical abuse, denial of resources, opportunities or services and Intimate Partner Violence (IPV).

SEA/SH will be used for this GBV Action Plan, since the GBV risk for the project are related to workplace for NT and the other institutions including the MSMEs.

3.2 Potential Project-Related SEA/SH Risks

The SAFER project will only engage direct workers who will be government employees mainly from the National Treasury, and consultants that the PIU will hire for the delivery of specific time-bound technical tasks and assistance. The civil servants engaged in the project will be subject to and governed by the Employment Act of 2007, public service regulations and Human Resources Manuals. The consultants on the other hand will be governed by a set of mutually agreed contracts.

1. Direct Workers. The project will engage the following types of workers as “direct workers”:
 - a. **Project Implementation Unit (PIU):** A PIU will be set up within the NT to manage the project. It will have a Project Coordinator (PC) with overall responsibility for the effective functioning of the Project. The PIU will include cross-cutting functions as follows:
 - i. Project Coordinator
 - ii. Procurement Specialist
 - iii. Project Accountant
 - iv. M&E consultant
 - v. Environmental and Social (E&S) safeguards consultant
 - b. **Civil Servants:** Various NT staff including economists, finance experts, accountants and procurement officers will be involved in the project. These will be drawn from the civil service at the NT.
 - c. **Consultants:** The PIU will be supported by technical assistance (TA) consultants, who will be hired on needs-basis. The consultants will be assigned to various functions including safeguards.

This GBV (SEA/SH) Action Plan will apply to project workers including those in the PIU, supporting civil servants, and consultants, whether those be fulltime, part-time, temporary and seasonal. The project scope does not provide or anticipate the employment of migrant workers. Although international and local consultants may be recruited to offer specific services, their conditions of engagement will be as contained in their contracts and TORs.

There are several concerns on the potential for GBV (SEA/SH): These include:

- a) increased risk of abuse and exploitation for vulnerable women in the workplace including at NT,
- b) increased risk of sexual exploitation and harassment in the context of project resources and opportunities.
- c) Other abuses may occur at the MSMEs-Credit Channel interface where vulnerable women yearn for credit.
- d) Non-SEA gender-based violence could result from intra household conflict over the receipt of cash/livelihood support and/or sexual exploitation of community members who are extorted for sexual favors in exchange for registration to benefit from or release of funds livelihood support.

This GBV (SEA/SH) Action Plan will cover the first two types of GBV (SEA/SH) (a and b) above. However, the National Treasury Environmental and Social Management System who will on lend to and Apex Financial Institution who will on-lend to participating financial institution.

Therefore, the SEA/SH action plan is prepared in line with the protocol laid out in the WB SEA/SH Good Practice Note, and the government of Kenya policies. The SEA/SH action plan details the operational measures that will be put in place to prevent and respond to project related GBV (SEA/SH) including managing related grievances. It incorporates codes of conduct for project workers and other strategies to prevent risks of GBV (SEA/SH) from occurring and establishes procedures for managing related grievances. The project should allocate an appropriate budget to implement the GBV (SEA/SH) action plan and assign the social development specialist to serve as a GBV focal person to oversee the implementation of activities. For its implementation, allocating an appropriate budget is required.

4 ADDRESSING GENDER BASED VIOLENCE AND SEXUAL EXPLOITATION AND ABUSE RISKS IN THE SAFER PROJECT

4.1 World Bank Requirements

The World Bank Group recognizes that World Bank-financed Projects can increase the risk of GBV in both public and private spaces by a range of perpetrators in several ways. Based on the protocol laid out in the WB GBV Good Practice Note, a GBV (SEA/SH) risk assessment was conducted on the SAFER, and it shows the likelihood of GBV (SEA/SH) risks related to employees. The assessment rates the level of risks at “moderate”. The following are the risk factors:

- Both national lifetime prevalence of intimate partner violence (physical and sexual) and sexual violence and child marriage are likely to occur during the life of the project.
- Risk of GBV (SEA/SH) by project personnel e.g., the representatives from the various financial institutions, and national treasury officials who may ask for sexual favors from women and girls for them to be included in the list of the businesses that qualify for the loans and businesses affected by Covid-19.

4.2 GBV (SEA/SH) Programming Guiding Principles

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.

Respect: Respect of the wishes, dignity and choice 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.

Safety and security: Awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by GBV (SEA/SH) will be sufficiently addressed and factored into any GBV (SEA/SH) intervention or initiative.

Non-discrimination: All GBV (SEA/SH) 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 GBV (SEA/SH), without regard to sex, sexual orientation, gender identity, age, ethnicity, religion or other status.

5 GBV PREVENTION AND RESPONSE MECHANISM FOR SAFER PROJECT

As described in section 2.1 and 2.2 above the SAFER project make use of the already existing systems for managing GBV (SEA/SH) in Kenya and will be guided by the Kenya Legal and Institutional Framework for Kenya already in place in management of the GBV (SEA/SH) risk for the project.

5.1 GBV (SEA/SH) Prevention in Kenya Applicable for the Project

The Kenyan Government has up in place mechanism to prevent GBV (SEA/SH) that include:

- a) Preventive Laws and policies: Gender mainstreaming across laws, policies and programmes; ·Enactment, amendment and implementation of laws and policies in line with the Constitution, international and regional human rights commitments ·Implementation of Standards and guidelines for GBV (SEA/SH) prevention at public and private service delivery centres.
- b) Harmful Social Cultural Practices and norms: Develop an advocacy and public awareness strategy for GBV (SEA/SH) ·Engage men and boys as allies, advocates, role models, champions and change agents in advocacy against GBV (SEA/SH) ·Provide alternative sources of income for female circumcisers.
- c) Enforcement: Capacity development of institutions and service providers responding to GBV (SEA/SH) across sectors including teachers, healthcare workers, Police, Chiefs, Magistrates, and Judges.
- d) Curriculum development: Integrate GBV (SEA/SH) training as part of the training curricula for Police, medical doctors, and schools.

5.2 Access to Quality and Comprehensive Responsive and Support Services

The National Guidelines on the Management of Sexual Violence (2014) details the management of sexual violence and outlines the steps for the treatment of sexual violence survivors:

- a) The government continues to ensure access to services. This involved capacity development of institutions and service providers responding to GBV (SEA/SH) across sectors.
- b) Standards and guidelines to regulate GBV (SEA/SH) response across sectors.
- c) Health care and psychosocial support services are available in health care facilities in Nairobi these services are available.
- d) Reporting of GBV (SEA/SH) perpetrators, as guided by the provision of the code of conduct issued by public service and police services are available.
- e) Establishment of gender desks within police stations that provide safe spaces for GBV (SEA/SH) survivors to report.
- f) Enhanced legal aid services for GBV (SEA/SH) victims through collaboration with the National Legal Aid Service (NALEAP), Law Society of Kenya (LSK), and legal aid-providing civil society organizations.
- g) The public service code of conduct includes disciplinary measures for perpetrators of sexual harassment at the workplace.
- h) Creation of awareness of existing services for increased uptake.
- i) Development of a national directory for GBV (SEA/SH) service providers

- j) Development of a multi-sectoral and multi-stakeholder GBV (SEA/SH) referral mechanism.

5.3 Coordination

Kenya has established a multi-stakeholder and multi-dimensional coordination framework for GBV (SEA/SH) interventions across all levels. This has involved partnerships among stakeholders along thematic areas of operation for establishment of referral infrastructure and linkages cutting across sectors working on GBV (SEA/SH) response and the establishment of a rapid response mechanism for GBV (SEA/SH) response.

5.4 Data Management and Monitoring & Evaluation

Kenya has established a comprehensive GBV (SEA/SH) monitoring and evaluation framework cutting across sectors at national and county level.

5.5 Research and development

The Government undertakes periodic studies, surveys and research to inform policies and programmes addressing GBV (SEA/SH).

5.6 Resource Mobilization Towards Sustainable GBV (SEA/SH) Response and Prevention Programmes

The government continues ensure that there is sufficient budgetary allocation by Government to implement this the GBV (SEA/SH) policy by promoting a gender responsive budgeting, strengthening collaboration with development partners, fostering public-private partnerships, providing technical support to key government institutions charged with implementing the GBV (SEA/SH) policy, through the ministry of devolution and planning.

5.7 Sustainability

The GBV (SEA/SH) policies promotes community participation, integrating GBV (SEA/SH) strategy into existing financing mechanisms and fostering inter-agency cooperation in the delivery of GBV (SEA/SH) services.

5.8 Institutional Setup for Management of GBV (SEA/SH) in Kenya

As guided by the legal framework, institutions involved in management of GBV (SEA/SH) include:

- a) Ministry responsible for Gender: Overall leadership and coordination in policy implementation, and resource mobilization, data aggregation and analysis.
- b) National Gender and Equality Commission: Provide oversight on the implementation of the Policy by state and non-state actors.
- c) Ministry responsible for Health: Delivering GBV (SEA/SH) health related services at national and county level such as health services, psychosocial support to survivors, health financing, trauma counseling, treatment of victims/survivors, community health awareness. Effective participation in multi-sectoral referral infrastructure. Providing continuous

- capacity building to staff on GBV (SEA/SH) health related services and provision of relevance data and research services.
- d) Ministry responsible for Security: Overall provision of security to create an enabling environment for GBV (SEA/SH) prevention. · Investigation and arrest of potential and actual perpetrators of GBV (SEA/SH). · Continuous training of the Police Service to handle gender based offences. Relevant data collection.
 - e) The Attorney General's Office: Administration of justice for GBV (SEA/SH) victims/survivors · Ensuring a standardized and coordinated government approach on matters relating to GBV (SEA/SH). · Streamlining the development and implementation of legislation. Particularly developing and reviewing legislation to strengthen and accommodate modern methods of evidence delivery.
 - f) Directorate of Public Prosecutions: Investigation and prosecution of GBV (SEA/SH) cases· Relevant Data collection
 - g) Ministry responsible for Education: Formal education curriculum design and review towards prevention and awareness creation of GBV (SEA/SH) manifestation at primary, secondary and tertiary levels of education. · Ensure safety for all students from gender-based violence in learning institutions. · Enlightening and sensitizing parents, community and stakeholders on the contributory factors of gender based violence and the need to for protection from gender based violence.
 - h) Judiciary: Develop Bail and Sentencing policies to assist in determining cases of GBV (SEA/SH) in a manner consistent with the law and constitution and ensure speedy determination of cases. · Increase and improve the institutional capacity of all courts to deal with gender-based crimes. · Ensure that Magistrates and Judges are comprehensively trained on matters of gender-based crimes. Ensure full implementation of the Witness Protection Act in relation to gender based criminal cases. · Develop and constantly review rules relating to gender-based crimes.
 - i) Ministry in charge of Labour: Ensure that employers and employees adhere to legal provisions on GBV (SEA/SH). Adopt Codes of Conduct aimed at tackling GBV (SEA/SH) in the workplace and design appropriate GBV (SEA/SH) prevention and response mechanisms.
 - j) Public Service Commission: developed the code of conduct for public service officers to follow that includes sexual harassment and disciplinary measures related to offences related to sexual harassment.
 - k) Defence: Ensure compliance with national and international standards.
 - l) Kenya Bureau of Statistics: Data collection management and analysis.
 - m) County Governments: Establish facilities and infrastructure necessary for GBV (SEA/SH) responses at the County level. Collect and aggregate information on prevention, occurrence, responses related to GBV (SEA/SH) Implementation of GBV (SEA/SH) programmes · Monitoring and review of GBV (SEA/SH) elimination programmes and delivery at the County level. Coordinate the referral infrastructure for survivors/victims across the different sectors in the County. Provide shelter houses for survivors of GBV (SEA/SH). Build the capacity of local administration to effectively speedily and appropriately handle cases of GBV (SEA/SH). Create public awareness on GBV (SEA/SH) and ensure that Chiefs and Assistant Chiefs register all cases of GBV(SEA/SH) in their areas.
 - n) Ministry responsible for Justice: Expand access to justice for the vulnerable groups and victims: · Reform and expand legal aid services to provide effective and efficient services to vulnerable groups including victims of gender based crimes.

6 GENDER BASED VIOLENCE REFERRAL PATHWAYS

The recommended approach by the World Bank in managing GBV (SEA/SH) incidents/cases is the survival centered approach, therefore the project team ensures that there is sufficient security for the victims once reporting has been done. The survivors are also accorded support in the steps and tools required for reporting until the matter is resolved. The referral mechanism is an important tool for effective reporting and management of the case.

Table 1 : Template for a Referral Mechanism

Telling Someone and seeking help (Reporting)			
Survivor/client tells colleagues, NT Human Resource officer, family, friend, community member Or service provider. That person accompanies the survivor to the health of psychosocial entry point.		Survivor/client self-reports to any service provider	
IMMEDIATE RESPONSE			
The service provider must provide a safe, caring environment and respect the confidentiality and wishes of the survivor/client, learn the immediate needs and give honest and clear information about the services available. If agreed and requested by survivor/client, obtain informed consent and make referrals, accompany the survivor/client to assist her/him in accessing services.			
Medical/health care entry point- GBV (SEA/SH)	Psychosocial support entry point - GBV (SEA/SH) Adult	Psychosocial support entry point- GBV (SEA/SH) Child – Under 18	
List of health facilities or other entities offering GBV (SEA/SH) care and support at the district level	Agencies (list agencies operating in the district)	The Children Services and other organizations involved in child protection.	
If the survivor/client wants to pursue police/legal action or if there are immediate safety and security risks, for example, if the survivor/client is a minor (under 16 years), refer and accompany survivor to the police/security or to the legal assistance for information.			
Safety and Security		Legal Assistance Counsellors	
AFTER IMMEDIATE RESPONSE, FOLLOW-UP AND OTHER SERVICES			
Over time and based on survivor's/ client's choice can include any of the following			
Healthcare	Psychosocial Services/Case Management	Protection, Security and justice actors	Basic needs – Children's services, safe shelter
Refer to facilities identified as able to handle GBV (SEA/SH) cases (each County has facilities that	This could be accessed at health facilities or through partners (CSOs, CBO of FBOs)	Agency name: The Mounted Police, Ministry of Labor and Social Protection, National Gender Commission.	Agencies: Children services SERVICES: Livelihood program, life

<p>manage GBV (SEA/SH).</p>		<p>SERVICES:</p> <ul style="list-style-type: none"> • Arrest perpetrator – police. • Gather evidence and complete file for case. • Inform survivor/client and witnesses on court hearing. • Provide physical protection/safe shelter • Provide legal counseling. • Offer transport, accommodation and meals for the survivor and witnesses and family members to attend court. 	<p>skills/vocational training/ entrepreneurship</p>
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7 ESTABLISHMENT OF A NATIONAL TREASURY SEXUAL HARASSMENT POLICY

Based on the Kenya legal and institutional framework on GBV (SEA/SH) and the provision within the public service commission. It is important that NT develops an institutional policy on sexual harassment. This should involve the following:

1. Any National Treasury employee who feels he/she is the victim of sexual harassment has the right to seek redress without prejudice.
2. The procedure for dealing with the reports/complaints has the following two stages:
 - The informal approach This is the first phase. This includes speaking to the harasser preferably in the presence of the witness, describing the unwelcome behavior and asking for it to stop. The victim can also write a letter to the harasser outlining the unwelcome behaviour detailing where and how events occurred, the letter should be signed and dated and a copy kept. A third-party intervention can be used where the aggrieved party is not comfortable in approaching the harasser personally. A shop steward or any neutral employee could approach the harasser on behalf of the victim and could mediate the matter informally. The Human Resources Management unit or a trusted colleague could also intervene and mediate.
 - The formal approach the survivor may lay a grievance against the perpetrator and follow the National Treasury's grievance and disciplinary procedures. If this process fails, a statutory conciliation may be considered, which is a process by which a neutral person from a bargaining council assists the parties to reach an agreement. The Labour Court can adjudicate when none of the above processes yield a result with which both parties are satisfied. Victims could institute a civil claim and sue the harasser and lay a charge under criminal law at the same time as they pursue labour procedures when the sexual harassment is rape, attempted rape or sexual assault. (ii) The disciplinary code and procedure and the relevant resolutions of the Public Service Co-ordinating Bargaining Council (PSCBC) and General Public Service Sector Bargaining Council (GPSSBC) will apply when discipline takes place.

Table 2 : GBV (SEA/SH) Action Plan Matrix

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
1	Prevention							
	National Policy for Prevention of Gender Based Violence	<ul style="list-style-type: none"> Implementation of the National Policy for Prevention and Response to GBV (SEA/SH). Training of employees of NT on the Code of Conduct provided for in the National Policy for Prevention and Response to GBV (SEA/SH). 	July 2023	PIU	PIU	<ul style="list-style-type: none"> Training of NT workers on the National Policy for Prevention and Response to GBV (SEA/SH). 	12 months	2 million
	GBV (SEA/SH) Committee	<ul style="list-style-type: none"> Awareness creation of the SAFER project with the GBV (SEA/SH) Committee. 	June 2023	PIU	PIU	<ul style="list-style-type: none"> Monitoring reports of GBV (SEA/SH) cases reported with NT by the GBV (SEA/SH) committee. 	Annually	500,000
2	Partnership Collaboration							
	Constitute the team that will focus on GBV (SEA/SH) issues at NT. It involves forming strong alliances with key	<ul style="list-style-type: none"> Awareness of the public service Code of Conduct for NT staff and state the disciplinary action for breaching any part of it 	Quarter 1 for the initial training.	PIU E&S Consultant	E&S Consultant	<ul style="list-style-type: none"> Number of trainings conducted Number of PIU and NT 	10 days	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
	bodies such as the public service commission, Department of Gender, Police Service, and Judiciary DPP office.	<p>including sexual harassment.</p> <ul style="list-style-type: none"> • Offer training that will equip the team to handle the rest of the project team with integrity while inculcating various tools that will deal with GBV (SEA/SH). • Agree on which stakeholders will constitute the GBV (SEA/SH) management team and each of their roles. • Develop terms of reference that will guide the GBV (SEA/SH) management team. • Hold workshops for the GBV (SEA/SH) management team. • Develop operational guidelines. 	<p>Once every quarter.</p> <p>Follow up training which will include sharing of practical experiences.</p>			<p>Leadership training.</p> <ul style="list-style-type: none"> • Focal point identify. 		
	Continually review the GBV (SEA/SH) measures and recommend any revision as the need arise to	<p>Include the items below in the Organized regular PIU meetings:</p> <ul style="list-style-type: none"> ○ SEA and SH agenda ○ Reports and updates 	Start in quarter one and continuous	PIU	GBV (SEA/SH) Consultant	<ul style="list-style-type: none"> • Number of monitoring of project meetings held with GBV 	10 days	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
	ensure that GBV (SEA/SH) procedures are practical and relevant or useful throughout the project period.	<ul style="list-style-type: none"> ○ Follow-up actions ○ Code of Conduct adherence 				(SEA/SH) as an agenda item <ul style="list-style-type: none"> ● Percentage of cases/issues/concerns followed up 		
3	Mapping out GBV (SEA/SH) Prevention and Response Service Providers							
	<p>Map out for referral services for survivors of GBV (SEA/SH).</p> <p>Undertake social cultural environmental mapping to identify stakeholders for response mechanism in relation to GBV (SEA/SH) contexts.</p> <p>Mapping of Service providers will be undertaken and those mapped will include CBOs, NGOs, and other civil society organizations.</p>	<ul style="list-style-type: none"> ● Conduct field visits and or remote (desk) reviews 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. ● Towards achieving this the following will be undertaken: <ul style="list-style-type: none"> ○ Conduct a desk review of GBV (SEA/SH) service providers in hosting counties and communities. Including 	Within the first quarter	E&S Consultant	PIU	The Mapping Report		

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
		<p>the prevention and response mechanism</p> <ul style="list-style-type: none"> ○ Field visits ○ Stakeholder consultations ● 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 GBV (SEA/SH) 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</p>	<ul style="list-style-type: none"> ● Considering the mapped out GBV (SEA/SH) prevention and response service providers, a referral pathway for service providers will be updated. ● Disseminate the referral pathway/list to stakeholders including service providers 	<p>Within the first quarter of the kickoff of the work plan</p> <p>To be frequently updated and maintained throughout project</p>	E&S Consultants.	PIU	<p>The referral pathway updated</p> <p>The level of dissemination undertaken</p>	3 Days	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
	report to and have access to service providers ensuring witness protection.		implementation.					
3	Capacity Building							
	<p>Capacity building is aimed at strengthening the ability to handle cases of GBV (SEA/SH) 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 GBV (SEA/SH), understand laws surrounding GBV (SEA/SH) and know the channels of reporting.</p>	<ul style="list-style-type: none"> • Provide detailed and comprehensive training on GBV (SEA/SH) highlighting its causes, consequences and the management and response to SEA/SH. • Offer training for community-based organizations, traditional and faith leaders, media, and other stakeholders on innovative approaches for prevention of, and response to GBV (SEA/SH). • Consolidate the teams responsible for effective research, monitoring, and evaluation of GBV (SEA/SH) programs and services to support the 	<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>	Ministry of Gender, Public Service Commission, E&S Consultant	PIU	Number of training sessions and staff trained to provide GBV (SEA/SH) related services in the counties.	Continuous	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
		<p>generation of evidence to inform decisions.</p> <ul style="list-style-type: none"> • Review the Contractors' and consultants' contracts • Assess the Human Resource manuals and staff capacity • Prepare project code of conduct • Appoint an internal focal point in charge of reporting (who might include one in the HR dept). 						
4	Prevention and Awareness							
	<p>To challenge the ways boys and girls are socialized and how gender stereotypes are created in popular media, culture and music. Create an understanding of the magnitude and effects of GBV (SEA/SH) and what can be done to prevent such</p>	<ul style="list-style-type: none"> • Structure a Marketing and Communication Strategy to educate and raise awareness about GBV (SEA/SH). • The development of the communication strategy should involve stakeholders at all and the communities where the project is implemented for referral services for survivors of GBV (SEA/SH). 	<p>Within the first quarter To be reviewed throughout the project implementation</p>	GBV (SEA/SH) consultant	PIU	<ul style="list-style-type: none"> • The Mapping Report 	Continuous	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
	<p>scenarios during and after the project.</p> <p>Eliminate cases and enhance early detection of any practices that may lead to GBV (SEA/SH).</p> <p>Helps to eliminate, or address any social, political, cultural tradition and religious factor that gives leeway to GBV (SEA/SH).</p>	<ul style="list-style-type: none"> • 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. • Involve the men and young boys in developing initiatives that will bring sustainable solution for GBV (SEA/SH). • Create a safe environment for girls and women to engage in development activities. 						
5	Response and Support							
	<p>NT to ensure that as prescribed by the Kenya legislation, NT has SEA/SH response mechanism that will be used in line with the WB Guidance.</p> <p>Raise employee awareness that GBV</p>	<ul style="list-style-type: none"> • Identify stakeholders for response mechanism in relation to SEA/SH contexts such as human right activists, survivors of GBV (SEA/SH). • Make provisions for various social facilities such as health, justice, legal and psychosocial support 	Across the project life cycle	PIU	GBV (SEA/SH) consultant	<p>A community that is well informed and are ready to protect women</p> <p>A well-structured legal body specifically dealing with GBV</p>	continuous	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
	<p>(SEA/SH) is a crime. Educate the employees public on various forms of violence against women and their implications. Sensitize and empower employees to respond appropriately to GBV (SEA/SH).</p> <p>To improve social support systems to survivors and perpetrators of GBV (SEA/SH) (including girls and boys).</p> <p>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>services for an effective, efficient, and human rights-based approach to GBV (SEA/SH) mitigation</p> <ul style="list-style-type: none"> • Provide dedicated and responsive needs-driven services to survivors of GBV (SEA/SH) there is need for special services such as emergency transport facilities. • In reference to capacity building enact a strong, well-coordinated and integrated multi-agency response to GBV (SEA/SH). This includes a good structure of referral networks that are in collaboration with community, traditional and religious leaders. • With the help of legal personnel, update the legal and institutional framework in harmony with the GBV 				<p>(SEA/SH) issues in place</p> <p>Operational code of conduct being adhered to.</p> <p>Women and girls who are aware of their rights</p> <p>Women are educated and placed in positions where they can benefit from the value addition programs</p>		

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
		<p>(SEA/SH) need that exists to help victims and survivors of GBV (SEA/SH).</p> <ul style="list-style-type: none"> • Build safe shelters with the right personnel and outreach services for the protection of survivors of GBV (SEA/SH). • Enforce the relevant law on the GBV (SEA/SH) perpetrators and re-integration in the community to reduce repeat offenses. 						
6	Grievance Management (GM) for GBV (SEA/SH) Responsive Reporting							
	<p>Channels that are friendly are put in place through which cases of GBV (SEA/SH) are reported. The community is made aware of the options available for reporting any cases of sexual</p>	<ul style="list-style-type: none"> • Review and amend the existing employees' GM to ensure it meets the GBV (SEA/SH) needs that currently exist. This should create a conducive environment that is safe for the victims to report and take shelter. 	<p>Ongoing throughout the project implementation</p>	<p>GBV (SEA/SH) Consultants</p>	<p>GBV (SEA/SH) consultants</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</p>	<p>Continuous</p>	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
	harassment or sexual exploitation and abuse.	<ul style="list-style-type: none"> • Guide employees on the channels of reporting cases of GBV (SEA/SH) and what constitutes sexual harassment as per the guidelines. • Outline for the employees the penalties and disciplinary actions that will be taken against anyone that breaches the code of conduct. 				response immediately.		
7	Monitoring and Evaluation							
	<p>Monitoring is aimed at developing a set of key quantitative and qualitative indicators to manage measure and monitor the progress and effectiveness of the integrated effort to deal with GBV (SEA/SH).</p> <p>It measures how well the policies are being</p>	<ul style="list-style-type: none"> • Develop instruments meant to measure the magnitude of reported cases of GBV (SEA/SH) categorized in their various forms, such as child sexual abuse. • Mechanism to measure the effectiveness of the various support systems. 	Takes place throughout the project life	PIU	GBV (SEA/SH) consultant	<p>How effective is the support and interventions offered to victims of GBV (SEA/SH)?</p> <p>How many success stories have been reported in relation to GBV (SEA/SH)?</p>	Continuous	

	Objectives	Activities / Steps to be taken to Address SEA/SH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators	Time period (days)	Estimated Budget (country currency)
	<p>adhered to, any issues that might emerge in regard to GBV (SEA/SH), and recommendation to improve any situation that may arise.</p>	<ul style="list-style-type: none"> • Conduct regular surveys to assess: <ol style="list-style-type: none"> (1) women's attitudes toward the acceptability of GBV (SEA/SH) (2) men's attitude towards GBV (SEA/SH) against women and girls. • Develop mechanisms to measure the impact of Public Education, Awareness Creation and Campaigns conducted by the GBV (SEA/SH) teams. • From time to time set up process indicators to assess how the project is being implemented. • Monitor and account for activities under the NT Sexual Harassment Policy. 						