



The Republic of Zambia
Eastern Province Jurisdictional Sustainable
Landscape Programme (ER-JSLP)

GENDER-BASED VIOLENCE ACTION PLAN



November 2022



LIST OF ACRONYMS

BIOCF	Biocarbon Fund
EP-JSLP	Eastern Province Jurisdictional Sustainable Landscape Programme
GBV	Gender-Based Violence
GHG	Greenhouse Gas
GEF	Global Environment Facility
CSA	Climate Smart Agriculture
FTCs	Fast Track Courts
GBV AP	Gender-Based Violence Action Plan
IDA	International Development Association
OSCs	One Stop Centers
SEA	Sexual Exploitation
SH	Sexual Harassment
UN	United Nations
VLOSCs	Village Led One Stop Centers
ZDHS	Zambia Demographic Health Survey
ZIFLP	Zambia Integrated Forest Landscape Project



DEFINITION OF TERMS

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 (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual, or mental harm or suffering; threats of such acts; coercion; and other deprivations of liberty. These acts can occur in public or in private (2015 Inter-Agency Standing Committee Gender-based Violence Guidelines, pg. 5).

Gender-based violence (GBV) service provider is an organization offering specific services for GBV survivors, including survivors of Sexual exploitation (SEA)/ Sexual harassment (SH), such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

Gender: Refers to the attributes and opportunities associated with being male and female, and the socio-cultural relationships between women and men, and girls and boys, as well as the relations between different groups of women and different groups of men. These attributes, opportunities and relationships are socially constructed and learned through socialization processes (Zambia Gender Policy, 2014)

Gender Equality refers to the equal rights, responsibilities and opportunities of women and men and girls and boys. Equality does not mean that women and men will become the same but that women and men's rights, responsibilities and opportunities will not depend on whether they are born male or female. Gender equality implies that the interests, needs and priorities of both women and men are taken into consideration, recognizing the diversity of different groups of women and men (Zambia Gender Policy, 2014)

Gender Equity is the process of being fair to people regardless of their gender. To ensure fairness, measures must be put in place to compensate for the historical and social disadvantages that prevent all persons from living health productive lives with same opportunities and rules for all gender

Gender Norms are social expectations that define what is considered appropriate behaviors for women and men. They shape and reinforce the different roles and behaviors of females and males within society

Patriarchy refers to the concept of an unequal gender relationship in which men are considered to be superior to women.¹

Perpetrator is a person who carries out a violent act or causes hurt and/or harm or imposes their will and actions on others without that person's consent.

¹ Hom J. (2013): Bridge Development – Gender: Gender and Social Movements Overview Report. UK. Pg 2.



Sexual exploitation and abuse (SEA) Sexual exploitation: 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 (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).

Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual abuse is a broad term, which includes several acts including rape and sexual assault, among others (UN Glossary on Sexual Exploitation and Abuse 2017, pgs. 5-6).

Sexual harassment (SH) is any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person in particular, when creating an intimidating, hostile, degrading, humiliating, or offensive environment. This may include unwelcome sexual advances, or requests for sexual favors and may take place through online activity or mobile communications as well as in person.

Survivor is a term generally used in the psychological and social support sectors to a person who has experienced sexual or gender-based violence because it implies resilience.

Survivor-centered approach is based on a set of principles and skills designed to guide professionals, regardless of their role, in their engagement with survivors (predominantly women and girls but also men, boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions, including non-intervention. In SEA/SH cases involving children, the survivor-centered approach is guided by an assessment of the best interests of the child.

Victim is a term commonly understood as a person who is, or has been, sexually exploited or abused or who has experienced any other form of GBV.

Violence against women is defined as any act of gender-based violence that results in, or is likely to result in, physical, sexual, or mental harm or suffering to women, including threats of such acts, coercion, or arbitrary deprivation of liberty, whether occurring in public or in private life (UN).



Vulnerability refers to the state of being considered weak or to be rendered insecure or being exposed to possibility of risk, attack, harm, criticism, or hurt.²

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² Moonga F. and Green S (2016): Social Work; Risks and vulnerabilities of children in Zambia: mooting responsive social protection interventions. Vol.52 n.3 Stellenbosch. *Online version* - ISSN 2312-7198. Pg. 351.



1.0 INTRODUCTION

This Gender Based Violence (GBV) Action Plan (GBV AP) has been prepared to identify and mitigate GBV risks in the implementation of the Eastern Province Jurisdictional Sustainable Landscape Programme (ER-JSLP). Any project, no matter where it is conducted, has the real potential to increase the risk of GBV for those in the project area. Like any other project where community members participate in various activities, EP-JSLP is likely to experience the risk of several forms of GBV and in particular, SEA and SH either in public or private spaces, by a range of perpetrators and in various ways which may be exacerbated with benefit sharing arising from the project. GBV is an inherently sensitive and often hidden issue. If one does not intentionally address this problem, it is easy to overlook. To prevent and mitigate potential risks of GBV/SEA and SH under EP-JSLP through an integrated mitigation and response approach, a GBV Action Plan is required to address the potential and actual GBV risks and guide the project's activities related to combating GBV and provide a framework for awareness increasing activities, capacity building initiatives and reporting of any form of violence that may happen during the project phase.

The objectives of the GBV AP under EP-JSLP are as follows:

- i. To identify potential risks of GBV including SEA and SH in the project areas and propose strategies for addressing these risks
- ii. Propose measures to prevent and mitigate GBV including SEA/SRH
- iii. To provide guidance on GBV SEA/SH grievance reporting mechanisms/referral pathways and other relevant protocols and mechanisms
- iv. Provide information on existing GBV service providers and their role in addressing GBV
- v. Provide for monitoring and reporting of implementation of the GBV SEA/SH Action plan

The report is organized as follows: Description of the EP-JSLP; Context of GBV at National and Eastern Province level; Stakeholder consultations held leading to the development of the GBV AP; GBV AP interventions; framework for addressing GBV grievances and finally monitoring and reporting requirements of the GBV AP.



2.0 PROJECT DESCRIPTION

The Eastern Province Jurisdictional Sustainable Landscape Programme (EP-JSLP) is an Emission Reduction Programme, an initiative by Government with support from the Biocarbon Fund (BIOCF), Global Environment Facility (GEF) and International Development Association (IDA)³. The EP-JSLP is a results-based carbon finance project that is jurisdictional in approach and performance-based in nature. The EP-JSLP's aim is to promote reduced greenhouse gas (GHG) emissions from the Agriculture Forestry and Other Land Use (AFOLU) sector in the Eastern Province, while simultaneously improving rural livelihoods including wildlife conservation and habitat management. The EP-JSLP will achieve emissions reductions by promoting interventions that prevent deforestation and forest degradation as well as reducing agriculture emissions. This includes improved land-use planning, Climate Smart Agriculture (CSA) development, sustainable forest management, Improved Wood Fuel Use, and laws and policies that protect forests and wildlife. alastairanton.ziflp@gmail.com,

The EP-JSLP encompasses the entire Eastern Province of Zambia covering 5,097,587 hectares. The province has fourteen (14) Districts namely: Chipata, as the provincial capital, Nyimba, Petauke, Sinda, Katete, Lundazi; Mambwe, Chadiza, Vubwi, Kasenengwa, Chipangali, Lumezi, Chasefu and Lusangazi. The province has a total of 57 Chiefdoms with a total estimated population of 2,065,590 in 2020 of which 1,022,467 (49.5 percent) are males and 1,043,123 (50.5 percent) are females. The rural population is estimated at 1,652,472 (80 percent).

EP-JSLP's key beneficiaries are poor rural communities (rural poverty stands at 76.6 percent)⁴, and those communities which directly depend on agriculture and forest resources for their livelihoods and therefore most vulnerable to climate change. The EP-JSLP will engage communities throughout the province, but with a particular focus on those living near forests including Game Management Areas and Forest Reserves. The targeted communities are expected to engage in activities that reduce deforestation through community forestry and collaborative management, adopt technologies to reduce wood-use that causes degradation,

³ See World Bank Project Appraisal Document Report no PAD:2220, April 13, 2017

⁴ LCMS, 2015



and adopt climate-smart agricultural practices for increased productivity, enhanced resilience and reduced greenhouse gas (GHG) emissions. This will include communities that are adjacent to wildlife protected areas, especially around the globally important biodiversity area of Lukusuzi and Luambe National Parks. The benefits of reduced carbon emissions, under this EP-JSLP, will have a global impact and help the country of Zambia meet its Nationally Determined Contribution (NDC) obligations under the United Nations Framework Convention on Climate Change (UNFCCC). It will further support the Declaration on Forests and Land Use at COP26 Glasgow which commits to working collectively to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

3.0 GBV PROJECT RISKS

Gender based violence is a global health and development issue. It is also a human rights violation and a form of discrimination that affects both women and men. However, existing data shows that females particularly the young women are the major victims of this scourge. GBV seriously inhibits women's ability to enjoy rights and freedoms on a basis of equality with men. The types of gender based violence include; physical violence, intimate partner violence, sexual abuse, early marriage, economic abuse, trafficking of persons and denial of basic necessities. The social acceptance of GBV and low help-seeking behavior is a source of concern, as such behaviors reinforce the commission of gender-based violence. These acts of violence harm the physical, mental, emotional and social wellbeing of victims and their families, impoverish communities, and reinforce other forms of violence throughout societies.

3.1 Existing Data

Existing data shows that GBV continues to be highly prevalent in Zambia. This section highlights the national GBV prevalence in relation to child marriage, physical and sexual violence. It also provides GBV prevalence rates for Eastern Province.

Child Marriage. Child marriage is highly prevalent in Zambia. According to the ZDHS (2018), 9 percent of women aged 25 to 49 were married by age 15 and 39 percent were married by age 18. Many of these marriages also involve significant age gaps as only 4.4 percent of men in the same age cohort were married by age 18 and 14 percent by age 20 respectively.⁵ Nationally, the median age at first marriage is 19.1 years for women and 24.4 years for men, and it varies according to region and urbanicity as shown in Figure 3.⁶

⁵ ZDHS (2018), p. 67

⁶ ZDHS (2018), p. 68



Physical Violence. 36 percent of all women (single, ever-married, divorced) aged 15-49 have experienced physical violence since age 15. Women and girls in rural areas are more likely to have experienced physical violence than women in urban areas (37 percent and 34 percent respectively), and the percentage of women who have ever experienced physical violence is highest among divorced, separated, or widowed women at 52 percent.⁷

Sexual Violence. Fourteen percent of all women (single, ever-married, divorced) age 15-49 have ever experienced sexual violence in Zambia. Women and girls in rural areas are more likely to have experienced sexual violence than women in urban areas (15 percent and 13 percent respectively).

Eastern province where the EP-JSLP will be implemented is largely a rural area with high prevalence of GBV. Statistics show that women and girls in rural areas experience higher rates of GBV compared to women in urban areas and child marriage rates are higher in rural areas compared to urban areas. Box 1 one shows the levels of GBV in Eastern Province.

The help seeking behaviour in instances of GBV is very low. Overall, women age 15-49 who have experienced physical or sexual violence have a tendency not to seek help or tell someone. Only 3 in 10 women (35%) who ever experienced physical or sexual violence sought help, while 13% never sought help or told someone 52% never sought help and never told anyone.⁸

Box 1: Key Evidence for Eastern Province

Key Evidence for Eastern Province
42.0 percentage of women aged 15-49 have experienced physical violence since age 15
14.3 percentage of women aged 15-49 who have ever experienced sexual violence
8.2 percent of women aged 15-49 who have ever been pregnant have ever experienced physical violence during pregnancy
61.3 percentage of ever-married women aged 15-49 with husbands/partners who have Ever demonstrated specific types of controlling behaviours
34.9 percent of ever-married women aged 15-49 have ever experienced emotional, physical, or sexual violence committed by their current or most recent husband/partner

Source: ZDHS, 2018

3.2 Drivers of GBV

⁷ ZDHS (2018), p. 313

⁸ ZDHS (2018),p 318



Stakeholder consultations and other research indicate that there are a number of drivers of GBV. This section discusses the major GBV drivers that are also prevalent in Eastern Province.

GBV Drivers	Implications
Unequal Power Relations	The root cause of GBV lies in the unequal power relations between women and men which also results in women having fewer opportunities to participate in key decision-making positions and less access to productive resources.
Negative gender norms	Gender roles and norms that condone violence against women are deeply embedded to varying degrees throughout most societies and are predictive of violence perpetration.
Poverty	Poverty exacerbates gender-based violence in many ways because it increases the economic vulnerability of women and girls, and increases perpetuates the dependency syndrome and cycle of violence
Alcohol Abuse	Women whose spouses are associated with alcohol abuse face an increased risk of Intimate partner violence
Patriarchal values	These values promote male dominance and reinforces gender imbalance against women by preserving certain benefits in favor of men.

This GBV Action plan details the specific measures for mitigating GBV, SEA/SH risks under the project. The interventions are largely around awareness raising and advocacy to promote knowledge on rights, resources and available service.

3.3 Types of GBV that EP-JSLP can exacerbate

In the context of Bank-financed projects, project beneficiaries or members of project-affected communities (both adults and children) may experience SEA due to the goods, benefits or services to a project-affected community, either momentarily or indefinitely.⁹ The types of GBV potentially aggravated include SEA and SH although non-SEA forms of GBV may also be aggravated. Figure 1 shows the GBV risk areas in investment operations.

Figure 1: GBV Risk Areas in Investment Operations

⁹ GPN, World Bank



Sexual Exploitation and Abuse (SEA)	Workplace Sexual Harassment	Human Trafficking	Non-SEA
<ul style="list-style-type: none"> • Exploitation of a vulnerable position, differential power or trust for sexual purpose • Actual or threatened sexual physical intrusion 	<ul style="list-style-type: none"> • Unwanted sexual advances • Requests for sexual favors • Sexual physical contact 	<ul style="list-style-type: none"> • Sexual slavery • Coerced transactional sex • Illegal trans-national people movement 	<ul style="list-style-type: none"> • Physical assault • Psychological or physical abuse • Denial of resources, opportunities or services • Intimate partner violence

Definitions and some examples

Source: Good Practice Note, World Bank, 2018

3.4 Project Risks

Risk of Gender-Based Violence, Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) may arise in the following situations during the project lifespan:

- (i) Due to potential compensation and mechanisms of transfer of benefits, inequality may be exacerbated where heads of households are represented in those arrangements to the exclusion of females
- (ii) Where compensations are involved, the risks for women include being excluded in discussions around mechanisms of transfer of benefits as well as distribution of ultimate compensation itself. Husbands or male partners may refuse to share information about the project and compensation plans. More specifically, intimate partner violence is likely as a result of increased household tensions related to the distribution and control of compensation benefits. Other forms of abuse could include emotional abuse and spousal abandonment
- (iii) When women are confronted with traveling long distances to access work opportunities (e.g., nursery sites) or forced to travel for the afforestation and reforestation related activities they are at risk of exploitation and abuse especially after dark;
- (iv) Due to interactions between community and project workers contracted to undertake community projects after benefit sharing there are risks of transactional sex and this could also result contracting contagious diseases including STDs and STI's Due to prevailing cultural norms prevalent in the area e.g., insecurity of women's rights to land and property and economic dependence on



- male relatives notably common in the rural and peri urban areas and which create barriers for women’s effective participation in community governance structures
- (v) The presence of income projects creates changes in the communities in which they operate and can cause shifts in power dynamics between community members and within households. It is key to assure mechanisms of transfer of benefits engage validation processes to minimize risks and also that services do not create opportunities for project actors to sexually exploit or abuse

3.5 Laws and Policies Addressing GBV

The Government has signed and ratified all relevant major international instruments, including the Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and the Convention on the Rights of the Child (CRC), and is a signatory to the African Charter on Human and People’s Rights (ACPHR), the African Charter on the Rights and Welfare of the Child, as well as the Southern African Development Community (SADC) Declaration on Gender and Development and its addendum on the Prevention and Eradication of Gender-Based Violence.

The national response to GBV in Zambia is anchored on National Action Plan on GBV as well as the National Gender Policy 2014 both of which are currently under revision. In addition, there are legal protections from gender-based violence found in the Anti-Gender Based Violence Act, No. 1 of 2011. Other key legal, policy and development frameworks, illustrating commitment to the rights and protection of women and girls include the following: The Penal Code Act which is the main law under which perpetrators of GBV are charged with a criminal offense in Zambia and it has undergone several amendments such as the Amendment Act No. 15 of 2005 and Amendment Act No. 2 of 2011 which set a minimum sentences of 15 years for anyone convicted of child defilement and rape and a minimum sentence of 20 years for human trafficking; The Gender Equity and Equality (GEEA) Act No. 22 of 2015 GEEA which domesticated most of the international and regional human rights instruments on gender, prohibits sexual harassment and harmful social, cultural, and religious practices and provides for the elimination of all forms of discrimination against women; the Education Act, No. 23 of 2011 which prohibits a learner who is a child from entering into any form of marriage; the Marriage Act, CAP 50 of the Laws of Zambia which prohibits the marriage of anyone below the age of 16; the Anti-Human Trafficking Act No. 11 of 2008 which provides for prohibition, prevention and prosecution of human trafficking and domesticates the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons.



4.0 STAKEHOLDER CONSULTATIONS



Consultative meeting held at Crystal Springs in Chipata

The development of the GBV Action Plan relied on review of previous stakeholder consultations conducted and World Bank guidelines for developing a GBV Action plan to ensure compliance to Safeguarding requirements (See Link with report on previous consultations). This was followed by broad based stakeholder consultation meetings held in Chipata district with participants drawn from government, traditional leaders, World Bank, NGOs, and community representatives over a period of 3 days. Some **138** stakeholders (43 female and 95 male) participated indicated in Table 1.

Table 1 – No. of Consultation Meeting Participants

Date	Venue	Female	Male	Total
29.11.22	Nyamfinzi Hotel	20	35	55
30.11.22	Crystal Springs	08	25	33
01.12.22	Protea Hotel	15	35	50
Total		43	95	138
Proportion of total (%)		31	69	100

The stakeholder consultations revealed that physical, sexual, emotional/psychological and economic violence including child marriage and child labor (cattle herding among boys) were prevalent and women and girls were disproportionately affected. The province also faces a



number of negative gender norms and negative practices such as *chinamwali*,¹⁰ some *nyau*¹¹ practices although it must be admitted that this practice has transformed a lot and it is also used to conduct awareness for gender-based violence, early marriage, gender stereotyping, patriarchal systems among others.

Stakeholders also highlighted that implementation of the EP-JSLP may increase risk to GBV because of increased income and employment opportunities which may result in sexual exploitation and abuse by men requesting sexual favours from women and women chairing a benefitting group may suffer abuse at home because the husband might feel intimidated by her new position with suspicions of her making a lot of money.

The stakeholder also highlighted several interventions currently being undertaken to address GBV which include hospital-based and Village-led One Stop Centres; Medical, Police, Religious, family and Police support; GBV Fast Track Court (FTC); Engagement of traditional leaders; Anti GBV Centres; Awareness raising on GBV including dissemination of IEC materials among others.

5.0 GBV NATIONAL ACTION PLAN ACTIVITIES/INTERVENTIONS

This section details the specific measures for mitigating SEA/SH risks under the EP-JSLP project. The following link can be used to access the National Dashboard containing information on GBV services providers for GBV case management: <https://tinyurl.com/2hsyu6v4> This GBV AP proposes interventions that aim at building on existing GBV interventions in the province outlined in Table 2.

TABLE 2 – GBV (Including SEA/SH) Prevention and Response Action Plan

S/N	Activity to Address GBV	Responsible Person	Key Performance Indicators	Estimated Budget	Timelines
1	Awareness Raising on the EP-JSLP GBV Action Plan and GBV in project operational areas				
1.1	Sensitization of EP-JSLP district safeguards focal point persons on the GBV Action Plan	Environmental and Social Safeguards	# EP-JSLP FPs sensitized	TBA	TBA

¹⁰ Chinamwali is a rite of social maturation where a girl is transformed into an adult through a process that legitimizes her “new” gender and sexual roles and teaches her how to internalize her gender and sexual identities through a process of enculturation to enable her to learn what is culturally acceptable behaviour of what it means to be a woman (Talakinu, C. M. (2018). I Am Because of What I Know I Have”: A Descriptive Analysis of Chinamwali in Preparing Women for Womanhood, Sexual Life and Reproduction. *Africology: The Journal Pan African Studies*, 12, (7)).

¹¹ Nyau (meaning mask or initiation) refers to a traditional dancer that has passed through special initiations and is practiced by the Chewa people found in Eastern Province of Zambia and other countries such as Mozambique, Malawi where the Chewa people are found. The Nyau dance is a protection against evil and an expression of religious beliefs that permeate society and involves intricate footwork and flinging of dust into the air. The dancers appear in masks representing the dead, the living or animals.



		Specialist/Project Coordinator			
1.2	Support ongoing efforts on awareness creation and inclusive community engagements on GBV in EP-JSLP operating areas with a focus on: <ul style="list-style-type: none"> Tackling negative gender norms Financial literacy <i>Where necessary, engage a GBV expert to support the process</i>	Environmental and Social Safeguards Specialist/ M&E Officer	# And type of awareness creation supported # People reached with GBV awareness	TBA in the ER Program Budget	TBA
1.3	Support Development and translation of gender responsive and culturally appropriate IEC materials on GBV and gender norms	Environmental and Social Safeguards Specialist/M&E Officer	#IEC and type of IEC materials supported	TBA in the ER Program Budget	TBA
2	Capacity Building on GBV for Project Focal Points and Community Stakeholders				
2.1	Training focal point persons on GBV to include: <ol style="list-style-type: none"> Grievance Reporting Mechanism Responsibilities and reporting Confidentiality and whistle blower protection <i>Where necessary, engage a GBV expert to support the process</i>	Environmental and Social Safeguards Specialist/M&E Officer	# Trainings and type of trainings held # Trained	TBA in the ER Program Budget	TBA
2.2	Support ongoing training efforts targeting community project stakeholders involved in GBV case management <ol style="list-style-type: none"> Strengthen the reporting mechanisms & procedures of local systems Strengthen a survivor centered referral and response mechanisms Strengthen coordination for better GBV services provision 	Environmental and Social Safeguards Specialist/M&E Officer	<ul style="list-style-type: none"> Number of Trainings done with partners on SGBV Number of quality reports generated Number of survivor referrals done	TBA in the ER Program Budget	TBA



	<i>Where necessary, engage a GBV expert to support the process</i>				
2.3	Support ongoing GBV Coordination meetings at chiefdom level <ul style="list-style-type: none"> Develop/strengthen GBV referral pathways 	Environmental and Social Safeguards Specialist/M&E Officer and Project Coordinator	# Of GBV coordination meetings held	TBA in the ER Program Budget	TBA
3	Strategic Engagement of Traditional Leaders				
3.1	Create awareness among Traditional leaders (Chiefs, Indunas, Headperson) on the EP-JSLP GBV Action Plan	Environmental and Social Safeguards Specialist/M&E Officer	# Of TL led awareness raising platforms supported	TBA in the ER Program Budget	TBA
3.2	Support exposure visits for Chiefs ¹² to learn from other chiefdoms who have managed risks arising from Carbon Emission benefit sharing	Environmental and Social Safeguards Specialist/ Project Coordinator	# Exposure visits conducted	TBA in the ER Program Budget	TBA
3.3	Strengthen ongoing Traditional leader led community engagement platforms to tackle negative gender and cultural norms that have the potential to negatively impact on the EP-JSLP	Environmental and Social Safeguards Specialist/M&E Officer	# And type of activities conducted	TBA in the ER Program Budget	TBA
4	Monitoring and Reporting Mechanisms				
4.1	Conduct GBV including SEA SH risk assessment	Environmental and Social Safeguards Specialist/M&E Officer	# Risk Assessments conducted	TBA in the ER Program Budget	TBA
4.2	Monitor GBV including SEA SH in relation to project related activities	Environmental and Social Safeguards Specialist/M&E Officer	# Monitoring activities # Monitoring reports submitted	TBA in the ER Program Budget	TBA

¹² In most instances project to make deliberate efforts for women to be included in these strategic engagements with traditional leaders



4.3	Reporting on compliance to safeguarding issues pertaining to project beneficiaries	Environmental and Social Safeguards Specialist/M&E Officer	# Of reports submitted	TBA in the ER Program Budget	TBA
5	GBV Survivor Fund				
5.1	Develop mechanisms to support GBV survivors within the Benefit sharing plan	Environmental and Social Safeguards Specialist/M&E Officer	# Survivors supported	TBA in the ER Program Budget	TBA

7.0 GRIEVANCE REDRESS MECHANISM

The Grievance redress Mechanism (GRM) will guide the receipt, and mediation of complaints and response to grievances from project stakeholders and project affected persons including grievances linked to sexual exploitation and abuse (SEA) and sexual harassment (SH). Nonetheless, aggrieved persons are free to directly access other courses of action such as the Police or court system as provided by the laws of Zambia without any hindrance or retribution from the project.

7.1 Objectives of the GRM

The GM is intended to:

- i. Provide project affected people with avenues for lodging concerns, complaints and resolving a dispute arising from project activities (see Annex A).
- ii. Provide avenue for vulnerable groups and victims of SEA/SH to have equal access to grievance redress process and support.
- iii. Provide guidelines to ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants

7.2 Composition of the SEA/SH GRM

- i. The **SEA/SH GRM is composed of:** (a) a Focal Point; and (b) a SEA/SH Committee, each with qualifications and experience satisfactory to the World Bank. All SEA/SH GRM staff shall have received training on GBV and SEA/SH, and on how to conduct basic fact analysis regarding whether: (i) the allegation in question is one of SEA/SH; and (ii) the alleged perpetrator is associated with a World Bank-financed project. The SEA/SH GM staff shall have relevant knowledge and expertise to: (i) enable them to differentiate SEA from SH; and SEA/SH from other forms of GBV; (ii) address allegations where the survivor is a child; (iii) uphold the guiding principles and ethical requirements for dealing with survivors of SEA/SH; and (iv) communicate in the



relevant local language(s). The GRM Focal Point shall have adequate knowledge of GBV services available, how to access said services, who to contact, any financial support that may be provided, and available options for assistance within and outside of the SEA/SH GRM.

- ii. **Conflict of interest:** Any actual or perceived conflict of interest must be avoided in selecting the SEA/SH GM members. The composition of the SEA/SH GRM may need to change depending on the nature and source of the allegation

7.3 Guiding Principles of A GBV SEA/SH GRM

The operationalization of this GRM shall be guided by the following principles.

Multiple channels for reporting -The reporting of a GBV/SEAH incident does not typically follow a uniform pattern due to the importance of maintaining confidentiality as well as the urgency for survivor to seek care and the preservation of evidence. As such, the complainant can use any avenue (formal and informal) to report including text message, email, phone call, written note, or word of mouth in person to trusted colleague, member of the GM, GBV service provider, or local CBO or NGO

Accessibility, transparency, and non-discrimination: A SEA/SH GRM must be accessible to all potential complainants and its existence and operation should be transparent to the community in which it is situated. SEA/SH GRM accessibility should be sensitive to gender, age, disability, and other potential contextual barriers. Adequate information about the existence and operation of the SEA/SH GRM must be provided in a language and manner accessible to any potential project-affected person. The principle of non-discrimination should be respected when receiving, processing, and referring the allegation.

Survivor-centered approach: All prevention and response actions must balance the respect for due process with the requirements of a survivor-centered approach under which the survivor's safety, confidentiality, choices, needs, and well-being remain central.

In assuring the Respect of the survivor, efforts must ensure that:

- A survivor is informed and contacted about the resolution of the case and any decision made. This should be done with care, so as not to put them in further harm.
- In the event that the survivor may have initially stated that they wanted to pursue a case in the courts of law, but she/he has now changed their mind, but they no longer want to pursue the case further, their decision should be respected.
- The survivor knows that they are welcome to reach out should they need assistance in the future.



Safety: The survivor’s physical and psychological safety as well as that of their family should always be considered the first priority. As such, quick and decisive action; safety planning support from service providers; confidential referrals; ongoing and careful communication should be explored and particularly to prevent retaliation.

Confidentiality: Confidentiality should cover all information in a complaint that may lead to the identification of a specific incident or those affected by the allegation. Confidentiality is a key to protecting survivor’s and witnesses’ safety. Confidentiality requires that information gathered about the allegation is not to be shared with persons or entities unless there is explicit permission granted by the complainant. Even in such cases, information-sharing should take place on a strict need-to-know basis, limited to essential information, and based on pre-established information sharing protocols which are in line with best practices for the handling of SEA/SH cases. Reports of grievances to the Bank and PIU shall only include an anonymized summary of allegations based on pre-established information sharing protocols.

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

- 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

Considerations regarding children and persons with intellectual disabilities: When the survivor is a child, the best interest of the child is the governing principle. Children are considered incapable of providing consent because they do not have the ability and/or experience to anticipate the implications of an action, and they may not understand or be empowered to exercise their right to refuse. The World Bank considers that a child is anyone under the age of 18 and, as such, not able to give free and voluntary consent. Similar additional considerations and protective safeguards may also apply where the complainant or survivor is a person with intellectual disabilities.

7.4 Internal Management of the GRM

The overall management of the GRM will reside with the designated Project Safeguards specialist. The Environmental and Social Safeguards Specialist, working with district focal points will specifically be responsible for:

- The disclosure of the GRM to project stakeholders.
- Sensitization of implementing partners and staff on the GRM.
- Keeping records of all complaints received, updating, and closing complaints.



- Pre-empting and facilitating activities of Grievance Committees (GC).
- Checking if all grievances have been addressed and follow-up actions have been taken.
- Escalating cases to PMU
- Referring survivors of SEA/SH cases to Gender Based Violence (GBV) service providers
- Monitoring and producing biannual performance report on the GRM.

7.5 Specific Steps of the SEA/SH GRM

STEP 1: Uptake, Sort and Process

- Upon receipt, the GM Focal Point sorts and processes the allegation. Allegations can be received by the SEA/SH GM through various means (e.g., online, phone, writing, or in-person), submitted by multiple types of complainants (e.g., survivor, witness, or whistleblower), and received through multiple channels (e.g., the PIU focal point, Contractor, Supervision Consultant, or GBV service provider). When the allegation is received in person, the GM Focal Point records the survivor's account of the incident; this shall be conducted in a private setting, ensuring that any specific vulnerabilities are taken into consideration.
- The SEA/SH GRM should not ask for, or record, information other than the following:
 - the nature of the complaint;
 - if possible, the age and sex of the survivor; and
 - if, to the best of the complainant's knowledge, the perpetrator is associated with the Project; and
 - if possible, information on whether the survivor was referred to services. It is important to seek the survivor's consent during intake and referral to services by clarifying in advance the remit of the GRM, what referral services entail, key elements that need to be collected, and informing of mandatory reporting laws as relevant. Standardized incident intake and consent forms should be used. The GM Focal Point shall record all allegations and information received respecting the principle of confidentiality.
- The GRM Focal Point shall receive all allegations but shall, where the complainant is not the survivor, encourage the complainant to reach out to the survivor and explain the potential benefit of coming forward alone or with the person reporting to the GRM. In the event that there is a credible concern about the safety of the survivor, the GRM Operator may attempt to approach the survivor directly to offer a referral to services with consent from the survivor

STEP 2: Acknowledge and Follow Up



(i) With the survivor's consent, the GRM Focal Point shall, within the shortest timeframe possible, refer the survivor to the relevant GBV service provider for any specific service the survivor may need and want in accordance with pre-established and confidential referral procedures. These services may include legal, psychosocial, medical care, safety and security-related support, and economic empowerment opportunities.

(ii) The GRM Focal Point shall, within 24 hours of receiving the allegation, inform the PIU of the SEA/SH incident, copying the World Bank, by sending an anonymized summary of allegation based on pre-established information sharing protocols. The GRM Focal Point shall ensure that the information collected regarding the complainant and allegations respects the principles of confidentiality, anonymity, and consent. Elements to be reported should only include:

- the age and sex of survivor;
- the type of alleged incident (as reported);
- whether the alleged perpetrator is employed by the project; and
- whether the survivor was referred to a service provider.

STEP 3: Fact Analysis

If the survivor wishes to pursue disciplinary action in addition to the referral to services provided, the GM Focal Point shall refer the case to the SEA/SH Committee to analyze the facts of the allegation by determining whether:

- i. the allegation falls within the definition of SEA/SH; and
- ii. the alleged perpetrator is an individual associated with a World Bank-financed project.

If the SEA/SH Committee confirms these two elements, it shall refer the allegation to the employer, who shall then be responsible for investigating the allegations. If national law requires it, the SEA/SH Committee may be obliged to refer the complaint to the local authorities for further investigation and eventual criminal prosecution. The survivor should be made aware of legal obligations of reporting certain incidents before disclosing the complaint, again consistent with the principle of consent. In all cases when there is no mandatory reporting, referral to local authorities should be done exclusively with the survivor's consent.

STEP 4: Monitor and Evaluate

The GRM Focal Point shall compile relevant data about SEA/SH allegations in accordance with the principles of safety and confidentiality. The GRM Focal Point shall issue regular reports to the PIU and the World Bank, containing basic information on the types of SEA/SH allegations,



the number of the allegations related to a World Bank-financed project, and the age and sex of the survivor to enable them to track grievances.

STEP 5: Provide Feedback

If the survivor wishes to pursue disciplinary action, the GRM Focal Point shall provide feedback to the survivor on the receipt and reporting of the allegation. The GRM Focal Point shall also inform the survivor when the matter has been referred to the employer for disciplinary action. Survivors may also prefer to go directly to the employer themselves or through their legal representative after having consulted with referral services.

STEP 6: Closure of Process

(i) If the survivor does not wish that disciplinary action be pursued by the employer, and has not pursued legal action independently, the process is closed after the referral to services has been provided.

(ii) In cases where the survivor seeks disciplinary action to be pursued by the employer or where the survivor pursues independent legal action, the process is closed in the SEA/SH GRM once that disciplinary or legal action has been initiated. The GRM's tracking records should show the results of the referral and the chosen follow-up action (i.e., employment sanction or judicial verdict). Should the survivor seek further assistance from the SEA/SH GRM, the survivor may return to the GRM.

(iii) All SEA/SH survivors who come forward before the project's closing date should be referred immediately to the GBV service provider for health, psychosocial and legal support. If a project is likely to close with SEA/SH cases still open, appropriate arrangements should be made with the GBV service provider, prior to closing the project, to ensure there are adequate resources to support the survivor for an appropriate time after the project has closed. Since funding cannot be provided by the project after the closing date, other funding arrangements shall be made (Borrower, other projects within the portfolio that may have aligned objectives and budget flexibility, extension of the closing date).

7.6 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection



Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit: <https://www.worldbank.org/en/projectsoperations/products-and-services/grievance-redress-service>. For information on how to submit complaints to the World Bank Inspection Panel, please visit, www.inspectionpanel.org. World Bank Grievance Redress System Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS).

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8.0 MONITORING AND REPORTING

In the course of project implementation, the GBV Action Plan will be periodically updated, as necessary, in a manner acceptable to the Bank. Any major changes to the project related activities and to its schedule will be duly reflected in the GBV AP. PIU will prepare and submit to the Bank quarterly and annual GBV AP implementation reports including GRM related issues. The quarterly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for GBV related information, along with the Project's ability to address those in a timely and effective manner. All Key Performance Indicators (KPIs) of the GBV AP will be monitored on a regular basis as part of the compliance status of project implementation.



Annex A: GBV/SEA/SH Reporting Format

SN	INCIDENT DETAILS		Guiding notes
1	Type of Violation		SEA/SH (by UNOPS, IP or contractor staff)
			GBV (by third party)
2	Nature of the incident reported (What happened and by whom)		Basic facts of the incident: What, Who. Is the incident related to the project? No in-depth details should be asked for.
3	Source of information		Community Focal Point, GRM Operator, email, other (specify)
4	Where did the incident occur		Project site
			City
5	When did the incident occur		Date
6	Additional information (if available)		Sex, Age
<p>The identity and safety of a survivor must be protected at all times. No personal data or identifying information about a survivor or their experience can be shared through this document. Personal/identifying information includes the survivor's name, perpetrator(s)' name, date of birth, home address, the exact time and place the incident took place, visible disability, residence status.</p>			