



**REPUBLIC OF SOMALILAND  
MINISTRY OF INFORMATION AND COMMUNICATION  
TECHNOLOGY (MICT)**

**EASTERN AFRICA REGIONAL DIGITAL INTEGRATION PROJECT  
(EA-RDIP)**

**SEXUAL EXPLOITATION AND  
ABUSE/SEXUAL HARASSMENT ACTION PLAN**





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**(EA-RDIP)**

**PROJECT IMPLEMENTATION UNIT (PIU)**

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## **ABBREVIATIONS & ACRONYMS**

<b>CoC</b>	Code of Conduct
<b>COVID19</b>	Corona Virus Disease 2019
<b>EA-RDIP</b>	East Africa Regional Digital Integration Project
<b>ESF</b>	Environmental and Social Framework
<b>GBV</b>	Gender-Based Violence
<b>GM</b>	Grievance Mechanism
<b>GPN</b>	Good Practice Note
<b>MICT</b>	Ministry of Information and Communication Technology of Republic of Somaliland)
<b>MOLSAF</b>	Ministry of Labor, Social Affairs and Family of Republic of Somaliland
<b>MoPWL&amp;H</b>	Ministry of Public Works, Land and Housing of Republic of Somaliland
<b>OHS</b>	Occupational Health and Safety
<b>PIU</b>	Project Implementation Unit
<b>SEA</b>	Sexual Exploitation and Abuse
<b>SEP</b>	Stakeholder Engagement Plan
<b>SH</b>	Sexual Harassment
<b>SOB</b>	Sexual Offences Bill (Somaliland draft law
<b>SOPs</b>	Standard Operating Procedures
<b>SPD</b>	Standard Procurement Documents
<b>VAC</b>	Violence Against Children
<b>WB</b>	World Bank

# 1. INTRODUCTION

## 1.1 Project Background

Over a five-year period (2023 -2028), the Eastern Africa Regional Digital Integration Project (EA-RDIP) will be implemented in the Republic of Somaliland. Based on the Single Digital Market (SDM) concept, which charts out the concurrent integration of the connectivity, data, and online market layers, the initiative seeks to promote the regional integration of digital markets in Eastern Africa. be in line with regional goals, such those of the African Union (AU). The goal of the Eastern Africa Regional Digital Integration Project (EA-RDIP) is to support the Republic of Somaliland in expanding data flows, digital trade, and cross-border broadband access to promote the development of an integrated digital market across Eastern Africa.

## 1.2 Project Components

The project is designed around four integrated and mutually reinforcing components, which reflect the distinct but interconnected layers of an integrated regional digital market.

### 1.2.1. Component 1: Connectivity Market Development and Integration

- Sub-component 1.1: Cross-border and backbone network connectivity

This subcomponent will support the deployment of key missing cross-border and backbone fiber links to improve the resilience, coverage, and integration of regional and national connectivity networks. It will support the deployment of up to 825 km of new fiber along prioritized backbone network routes, including connecting the main cable landing station in Berbera to the major population centers, as well as establishing new cross-border links to Somalia and Ethiopia. The fiber is likely to be deployed in phases, starting in the north. Gap financing will be provided for the deployment of related routes, using a range of modalities to crowd in private sector financing. Commercial providers are expected to co-finance, design, build, and operate network infrastructure deployed on an open access basis and at reasonable rates to support affordable service expansion and competition.

- Sub-component 1.2: Last mile connectivity including in borderland areas

This sub-component will providing catalytic funding to unlock further infrastructure deployment in unserved or underserved areas, which are highly correlated with higher poverty levels and climate vulnerability (including in refugee/IDP camps and their host communities, located in rural and borderland areas) and to connect public institutions along fiber route. Infrastructure financed will be deployed using a range of modalities, including reverse auctions, bulk purchase of capacity<sup>81</sup> and/or licensing arrangements, that aim to maximize private sector financing.

- Sub-component 1.3: Enabling legal, regulatory and institutional ICT environment

This subcomponent will strengthen existing ICT frameworks and boost regulatory maturity to effectively spearhead the connectivity agenda and universal services targets through the development of new strategic, policy and regulatory instruments.

### **1.2.2. Component 2: Data Market Development and Integration**

- Sub-component 2.1: Cybersecurity frameworks, infrastructure and capacity

This sub-component will strengthen local capacity to effectively detect, respond to and mitigate evolving cyber threats and cybercrimes as well as support implementation of forthcoming cybersecurity legal and strategic frameworks.

- Sub-component 2.2: Data exchange, governance and protection

This subcomponent will support investments in enabling data infrastructure and governance frameworks that facilitate cost-effective and secure data storage, processing and sharing.

### **1.2.3. Component 3: Digital Market Development and Integration**

- Sub-component 3.1: Digital cross-border trade, payment and service enablers.

This subcomponent aims to enhance readiness to expand digitally enabled cross-border trade and service delivery, by introducing key enablers.

- Sub-component 3.2: Regional research and education networks (RENs), and training for digital skills.

This subcomponent will support the development of the digital skills base through support for SomaliREN, and new digital skills training programs.

**1.2.4. Component 4: Project Management and Implementation Support**

- This component will finance key project management functions, including procurement, FM, M&E, Communications as well as ESF compliance, with a particular emphasis on addressing the high security and GBV-related risks associated with the deployment of infrastructure and civil works, including. It will finance the establishment and operations of the main Project implementation Unit (PIU) at MICT, at National level.

**1.3 Approach and Methodology**

The overall objective of the action plan is to provide tools and frameworks that will support the EA-RDIP PIU in preventing and responding to the Project-induced GBV/SEAH risks. The plan was prepared as below indicated approach by undertaking.

- Literature review was undertaken on provisions of World Bank guidelines, global and national laws and policies, baseline studies on GBV/SEAH at national level.
- Identification of potential project-induced risks; provision of possible mitigation measures which included an assessment and plan for strengthening capacity within project workers; and key actions to be taken, such as institution(s) responsible and time frames for the implementation of each of the identified actions.

**1.4 Definition of Terms**

Below table provides an overview of terms that are applicable when discussing GBV/SEAH risks.

Term	Definition
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<p>Violence against women and girls (VAWG)</p>	<p>The 1993 UN Declaration on the Elimination of Violence against Women defined violence against women and girls 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 (Article 1). Violence against women and girls shall be understood to encompass, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>▪ Physical, sexual and psychological violence occurring in the family, including battering, sexual abuse of female children in the household, dowry-related violence, marital rape, female genital mutilation and other traditional practices harmful to women, non-spousal violence and violence related to exploitation.</li> <li>▪ Physical, sexual and psychological violence occurring within the general community, including rape, sexual abuse, sexual harassment and intimidation at work, in educational institutions and elsewhere, trafficking in women and forced sex work.</li> <li>▪ Physical, sexual and psychological violence perpetrated or condoned by the State, wherever it occurs (Article 2)</li> </ul>
<p>Gender-based violence (GBV)</p>	<p>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 (IASC 2015). Women and girls are disproportionately affected by GBV across the globe.</p>
<p>Sexual Harassment (SH)</p>	<p>Unwelcome sexual advances, requests for sexual favors, 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 SEAH is important so that</p>

	agency policies and staff training can include specific instructions on the procedures to report each. Both women and men can experience SH.
Sexual Exploitation and Abuse (SEA)	Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is further defined as “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” Women, girls, boys and men can experience SEAH. In the context of World Bank supported projects, project beneficiaries or members of project-affected communities may experience SEAH.
Child/ Forced early Marriage	Forced marriage is the marriage of an individual against her or his will. Child marriage is a formal marriage or informal union before age 18. Even though some countries permit marriage before age 18, international human rights standards classify these as child marriages, reasoning that those under age 18 are unable to give informed consent. Therefore, child marriage is a form of forced marriage as children are not legally competent to agree to such unions (The Inter-Agency Standing Committee IASC 2015).
Human Trafficking	The recruitment, transportation, transfer, harboring or receipt of persons, by means of force, the threat of force, other forms of coercion, abduction, fraud, deception, of the abuse of power, or of a position of vulnerability, or giving or receiving of payments or benefits to achieve the consent of a person, having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the sex work of others or other forms of sexual exploitation, forced labor or services, slavery or practices like slavery, servitude or the removal of organs (United Nations 2000. Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children).

Table 1.1: Definition of Terms

## **2. LEGAL FRAMEWORK AND GAPS RELATED TO SEAH AND GBV IN SOMALILAND**

Somaliland’s legal landscape reflects its unique cultural, religious, and historical trajectory. While international human rights norms embed Gender-Based Violence (GBV) firmly within a framework of gender equality and protection from all forms of discrimination, the understanding and adjudication of GBV in Somaliland is shaped by the interaction of three coexisting legal orders: statutory law, Shari’a (Islamic law), and customary law (Xeer). This pluralistic system creates both opportunities and profound gaps in the prevention, redress, and prosecution of Sexual Exploitation, Abuse, and Harassment (SEAH) and broader GBV-related violations.

The Somali terminology for GBV — “Xadgudubyo ku saleysan jinsiga” (violations based on sex/gender) — is rarely used in its full form. Instead, the shortened term “Xadgudub jinsiyeed”, with the word “sexual” often omitted due to sociocultural sensitivities and religious norms that discourage explicit public references to sexuality. This cultural framing has contributed to limited public discourse and awareness about GBV and has impeded the development of survivor-centered legal and institutional responses.

### **2.1 International Legal Instruments**

Somaliland has regained its sovereignty in 1991, though it remains internationally unrecognized and thus is not a formal State Party to most international human rights treaties. Nevertheless, Somaliland has expressed political commitment to the principles enshrined in key human rights frameworks — including the Universal Declaration of Human Rights (UDHR), the Convention on the Rights of the Child (CRC), and the African Charter on Human and Peoples’ Rights (Banjul Charter) — and has incorporated certain human rights norms into its domestic legal order through its 2001 Constitution.

However, Somaliland has not ratified or domesticated core gender-related instruments such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) or the Maputo Protocol (Protocol to the African Charter on Human and Peoples’ Rights on the Rights

of Women in Africa). The absence of binding obligations under these treaties contributes to the lack of a comprehensive legislative framework on GBV and SEAH, leaving protections fragmented and often aspirational rather than enforceable.

## **2.2 Somaliland Legal Context: Plural Legal Orders**

Somaliland's legal system is triadic, consisting of:

- Statutory Law – rooted in the 1960 Penal Code (inherited from the Italian colonial administration) and post-independence legislation.
- Shari'a Law – the overarching moral and legal framework, particularly governing personal status and family matters; and
- Customary Law (Xeer) – clan-based dispute resolution mechanisms administered by male elders.

While statutory law formally criminalizes certain acts of violence, Xeer remains the most accessible and dominant system, particularly in rural and peri-urban areas. State actors, including police and judges, often refer sexual violence cases back to clan elders for resolution. Under Xeer, sexual offences are typically treated not as crimes against the individual survivor, but as offences against the family or clan honor — and resolved through compensation or forced marriage between perpetrator and victim, rather than criminal accountability. This practice perpetuates impunity, discourages reporting, and undermines survivors' rights to justice and psychosocial recovery.

Shari'a law, while central to social legitimacy, is not formally codified in Somaliland's statutory courts but is frequently invoked in family law and personal status matters. However, its interpretation is inconsistent, and its integration with statutory and customary norms remains fragmented.

## **2.3 Statutory Law and GBV**

Somaliland's Constitution (2001) affirms key human rights principles. Relevant provisions include:

- Article 8 – guarantees equality of all citizens regardless of sex, religion, or social status.
- Article 21 – obliges the state to respect and implement fundamental rights and freedoms.
- Article 24 – guarantees human dignity and physical integrity.
- Article 36 – specifically recognizes the rights of women, including their right to equality and protection from harmful traditional practices.

Despite these provisions, constitutional guarantees are broad and abstract, offering no specific definitions or penalties for GBV-related offences. This leaves survivors reliant on the outdated 1962 Penal Code, which:

- criminalizes rape (Article 398) and “acts of lust with violence” (Article 399), prescribing 5–15 years and 1–5 years imprisonment respectively.
- prohibits forced prostitution (Article 408);
- lacks any legal age of consent, and
- uses narrow, moralistic definitions inconsistent with international standards.

Furthermore, there is no statutory recognition of intimate partner violence, marital rape, or sexual harassment as distinct offences. Survivors attempting to access formal justice face stigma, lengthy proceedings, corruption, and pressure to withdraw complaints.

## **2.4 Legislative Gaps and the Sexual Offences Bill (SOB)**

Recognizing these deficiencies, Somaliland’s government drafted the Sexual Offences Bill (2018) to modernize legal protections and align them with human rights standards. However, due to political and religious backlash — notably pressure from the House of Elders — the Bill was suspended and replaced in 2019 with a more conservative “Rape, Fornication and Other Related Offences Bill,” which reintroduced discriminatory provisions and diluted protections for women and girls. As of 2025, this bill remains stalled and has not been enacted, leaving a significant legislative vacuum on sexual violence and SEAH offences. Similarly, attempts to legislate a bill banning Female Genital Mutilation/Cutting (FGM/C) have stalled, despite Somaliland’s extremely high prevalence rates and constitutional commitments to protect physical integrity. The absence

of clear statutory protections perpetuates impunity, reinforces customary dispute resolution over formal prosecution, and leaves women, girls, and marginalized groups acutely vulnerable.

## **2.5 Intersection of Law and Practice: Access to Justice Challenges**

Even where statutory protections exist, their enforcement is weak and inconsistent, largely due to:

- Limited institutional capacity, especially among police, prosecutors, and forensic services.
- Deeply entrenched patriarchal norms that prioritize family honor over survivor protection.
- Social stigma that deters reporting; and
- Lack of survivor-centered services, including shelters, legal aid, and psychosocial support.

These factors combine to produce low reporting rates, frequent withdrawal of complaints, and reliance on Xeer settlements. As a result, survivors of SEAH and GBV face multiple layers of exclusion from justice and remain largely unprotected by law.

## **2.6 The World Bank Good Practice Note (GPN) on Addressing GBV in Projects**

In the context of development projects such as the Eastern Africa Regional Digital Integration Project (EA-RDIP), the World Bank Good Practice Note (2018) provides critical guidance for addressing SEAH and GBV risks in civil works. The GPN sets out a survivor-centered approach to:

- Identifying GBV/SEAH risks through risk assessments.
- Embedding Codes of Conduct for contractors and workers.
- Minimizing labor influx by prioritizing local recruitment.
- Strengthening grievance mechanisms and referral pathways; and

- Establishing clear accountability mechanisms within procurement and contract documents.

Applying the GPN is especially vital in Somaliland’s context, where weak statutory protections and entrenched social norms heighten the risk of SEA/SH during large infrastructure projects. Integrating the GPN’s requirements into all stages of project design and implementation — from procurement to monitoring — is essential to ensure that survivors are protected, cases are addressed promptly, and institutional capacity is strengthened.

### **3. SEAH PREVENTION AND RESPONSE ACTION PLAN**

#### **3.1 Overview**

Gender-Based Violence (GBV) including Sexual Exploitation, Abuse, and Harassment (SEAH) remains a significant barrier to gender equality and women’s participation in public and economic life in Somaliland. Although comprehensive prevalence data are limited, evidence from service providers and civil society organizations shows that sexual violence, intimate partner violence, workplace harassment, and harmful practices such as FGM/C and child marriage continue to affect women and girls<sup>1</sup>.

GBV is underpinned by deeply rooted patriarchal norms and Somaliland’s plural legal system, where statutory law, Shari’a, and customary Xeer practices coexist. Many GBV cases are still settled under Xeer, which prioritizes clan reconciliation over survivor rights<sup>2</sup>. This contributes to

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<sup>1</sup> SIHA Network, *Policy Paper on Gender Equality Agenda in Somaliland*, 2020

<sup>2</sup> Laas Geel Institute & NAFIS, *Legal Pluralism and Women’s Rights in Somaliland*, 2022.

underreporting, impunity, and weak access to justice. Survivors face stigma, fear of retaliation, and limited access to specialized, survivor-centered services.

Development projects like the Eastern Africa Regional Digital Integration Project (EA-RDIP) can inadvertently introduce or heighten SEAH risks by altering local power dynamics, bringing in outside workers, and creating sudden income flows. These risks must be anticipated, mitigated, and monitored from the outset, with survivor-centered grievance and referral systems embedded in implementation<sup>3</sup>.

### **3.2 Project Level GBV/SEAH Exposure Risks**

- **Weak Accountability and Oversight Systems:**
  - Given the multi-tiered contracting structure of EA-RDIP, with multiple implementing partners and sub-contractors, inadequate supervision, weak grievance channels, or insufficient background checks could allow perpetrators to go undetected or unpunished. Under Component 4 (Project Management), the absence of robust SEAH-sensitive Grievance Mechanisms (GMs) or clear reporting lines could erode survivor trust and institutional credibility, impeding early detection and response.
- **Unsafe Worksites and Living Conditions:**
  - Across civil-works corridors and installation zones, poor lighting, lack of gender-segregated WASH facilities, insecure accommodation, or unsafe transport routes particularly affecting female workers and residents can create environments conducive to harassment or assault. Under Component 1, where trenching, tower erection, or cross-border cable laying occur, safety audits to be conducted frequently to address these physical and environmental risks comprehensively.
- **Workplace Gender Norms and Backlash:**

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<sup>3</sup> World Bank, *Good Practice Note on Addressing GBV in Investment Project Financing*, 2022

- As Components 2 and 3 promote women’s inclusion in ICT training, data governance, and digital service employment, shifts in gender roles may provoke backlash or hostility within male-dominated workplaces or households. Women joining project-related jobs could experience harassment, intimidation, or even intimate partner violence (IPV) if perceived to be challenging patriarchal norms (NAFIS Network & MESAF, GBV Baseline Study in Somaliland, 2021). This underscores the need for proactive gender-transformative engagement, CoC enforcement, and PSS linkages.
- Customary Dispute Resolution Practices:
  - In the event of SEA/SH or VAC incidents, community pressure to resolve cases through Xeer (customary law) which prioritizes clan compensation or forced marriage over justice can undermine survivor-centered outcomes and deter formal reporting. Under Component 4, grievance redress and referral systems must therefore bridge formal, informal, and faith-based pathways, ensuring survivors access confidential, rights-based, and voluntary mechanisms (Laas Geel Institute, 2022).

Given the project’s scale, geography, and gendered social context, the EA-RDIP SEAH/GBV risk level in Somaliland is High.

### **3.3 Classification of GBV/SEAH**

GBV encompasses any harmful act based on gender norms or inequalities (IASC GBV Guidelines, 2015), including:

- Sexual Exploitation and Abuse (SEA): Abuse of power, trust, or vulnerability for sexual purposes (e.g. coerced sexual acts in exchange for work, services, or opportunities) (UN Glossary on SEA, 2017).
- Sexual Harassment (SH): Unwelcome sexual advances, requests for sexual favors, or other verbal, non-verbal, or physical conduct of a sexual nature that creates an intimidating, hostile or offensive work environment (ILO Convention No. 190).

- Violence Against Children (VAC): Physical, sexual, or emotional abuse, neglect, or exploitation of anyone under 18 (Convention on the Rights of the Child, Art. 19).

Other possible project-related forms of GBV include physical assault, psychological abuse, denial of resources or opportunities, and intimate partner violence.

### **3.4 Key Mitigation and Response Measures**

#### **a) Governance and Coordination**

- Appoint a GBV/SEA Specialist within the PIU (Ministry of ICT) to oversee this Action Plan.
- Establish a multi-sectoral SEAH working group with MESAF, Ministry of Justice, Attorney General’s Office, Police Gender and Child Protection Unit, National Human Rights Commission, and local GBV service providers (e.g. NAFIS members).
- Embed SEA/SH clauses and sanctions in all procurement, contracts, and supervision documents (World Bank, 2022 GPN).

#### **b) Safer Worksites and Labor Practices**

- Prioritize local hiring and provide upskilling where feasible.
- Ensure safe worker accommodations (lighting, lockable WASH, separate facilities by sex, accessibility for persons with disabilities).
- Conduct safety audits before construction and quarterly during implementation; promptly address hazards (IFC, 2020).

#### **c) Codes of Conduct, Vetting, and Training**

- Require all project-related workers to sign a Code of Conduct (CoC) explicitly prohibiting SEAH and VAC (WB Standard Procurement Documents, 2017).
- Conduct background checks and remove any staff credibly accused of SEAH.
- Deliver mandatory induction and refresher training (every 6 months) on SEAH, respectful conduct, and child safeguarding.

#### **d) Survivor-Centered Grievance Mechanism (GM)**

- Integrate confidential SEAH reporting channels (hotline, SMS/WhatsApp, focal points, secure boxes) into the project GM.
  - Collect only minimal data (age/sex, allegation type, link to project, consent for referral to GBV support services).
  - Ensure confidentiality, non-retaliation, and informed consent at all stages (IASC, Six Core Principles on PSEA, 2002).
  - The project GM will ensure all incidents of SEAH will be reported to the Bank within 24 hours
- e) Referral Pathways
- Map GBV services (health, psychosocial, legal aid, shelters, police gender units, disability-inclusive support) before works start in all project sites.
  - Establish clear referral protocols and regularly update service directories (MOLSAF GBV SOPs, 2021).
- f) Community Engagement and Risk Communication
- Conduct separate consultations with women, adolescent girls, and marginalized groups.
  - Develop accessible IEC materials in Somali on rights, services, and complaint channels.
  - Engage community leaders, elders, and women’s groups to build support for survivor-centered responses and zero tolerance of SEAH (NAFIS & SIHA, 2020).
- g) Monitoring, Accountability, and Learning
- The PIU GBV Specialist will carry out quarterly reviews to assess compliance with GBV/SEAH measures, test the effectiveness of reporting and referral channels, and recommend corrective actions to address any identified gaps
  - Tie contractor payments to SEAH compliance milestones (CoC signing, training completion, functioning GM).
  - Apply graduated sanctions for breaches, from warnings to contract suspension or termination.

### **3.5 Core Indicators**

- % of workers signing CoCs and trained on SEAH.
- # of functional SEAH GM channels per site.
- # of SEAH complaints received, referred (with consent), and resolved within timelines.
- # of community sessions held and % reaching women, girls, and marginalized groups.

### **3.6 Guiding Principles**

- Survivor-centered (safety, confidentiality, respect, informed choice)
- Do no harm and zero tolerance for retaliation
- Inclusion of women, youth, persons with disabilities, and minority clans
- Integration of SEAH prevention in all stages of project design and delivery
- Continuous risk assessment and adaptation based on feedback and audits

#### 4. SEA/SH Prevention and Response Measures

	<b>Objective:</b>	<b>TO INCREASE AWARENESS AND ENHANCE RESPONSE SYSTEMS FOR GBV/ SEA AND SH INCIDENTS</b>					
	<b>Activity to Address SEAH risk</b>	<b>Steps to be taken</b>	<b>Timelines</b>	<b>Institutional Focal Point</b>	<b>Monitoring (Who will monitor)</b>	<b>Output indicators</b>	<b>Budget (USD)</b>
<b>1</b>	<b>INCORPORATE GBV/SEAH REQUIREMENTS AND EXPECTATIONS IN THE CONTRACTOR AND CONSULTANTS' CONTRACTS.</b>						
1.1	Incorporate GBV/SEAH Requirements and expectations in the contractor and consultants' contracts.	Ensure that GBV/SEAH issues are incorporated in all contracts signed by contractors and consultants	Before project activities begin	GBV Specialist / PIU	PIU/ Procurement Specialist	SEA/SH requirement and expectation are adapted in bid document.  Bidding documents are reviewed and confirmed potential risks of SEA/SH are adequately addressed.	Activity to be done by the Procurement /GBV Specialists

1.2	Allocation of funds for GBV/SEAH related costs in procurement documents.	<p>Clearly define SEAH requirements and expectations in the bidding documents</p> <p>Evaluate the contractor's SEAH Accountability and Response Framework in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV/SEAH prevention and response requirements.</p>	During preparation of bid and Contract Documents monitoring on a quarterly basis	GBV Specialist / PIU	PIU/ Procurement Specialist	<p>Bid documents with clearly defined SEAH incorporated in the bidding documents.</p> <p>Contract documents with clearly defined SEA/SH and Inclusivity of vulnerable people clauses/requirements.</p> <p>Ensure as standard practice in contractor Codes of Conduct for workers, prohibition of all forms of SEA/SH and other forms of GBV, including language on prohibition against sexual activities</p>	N/A
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						with anyone under the age of 18.	
						Numbers of Contractors and workers trained of prevention GBV/SEA	
<b>2</b>	<b>CODES OF CONDUCT SIGNING AND GBV/SEAH ORIENTATION TRAININGS</b>						
2.1	Codes of Conduct signed and understood.	Define the requirements to be included in the CoC which addresses GBV/SEAH  Review CoC for provisions/clauses that guard against GBV/SEAH  Have CoCs signed by all those with physical presence at the project site.	During Project implementation	GBV Specialist/PIU	GBV Specialist/PIU	Code of conduct reviewed and ensured the GBV/SEAH, Child protection  Environmental and social issues included  Percentage of workers that have signed a CoC  Percentage of workers that have attended the CoC training.	Cost of training of the CoC.  Included in the SEAH orientation training and for contractors it will be included in

							the C-ESMP.
2.2	Conduct GBV/SEAH orientation training for all workers. (Project staffs), Contractors, sub-contractors and consultants	Develop a training plan  Develop training materials  Conduct training on GBV/SEAH risks, responsibilities, and legal/policy requirements for project staffs, contractors	Quarter 1 and 2 after contract signing  Retraining during Project implementation.	GBV Specialist/ Social Specialist/ PIU	GBV Specialist	Number of trainings conducted  Number of workers who have attended GBV/SEAH training	50,000
<b>3</b>	<b>STRENGTHEN INSTITUTIONAL CAPACITY FOR GBV/SEAH RISK MITIGATION AND RESPONSE;</b>						
3.1	Strengthen co ordination and collaboration at national and sub	Participate in GBVAOR Meeting at the National level to improve understanding of the effectiveness and	Maintained throughout project durations	GBV Specialist / PIU	GBV Specialist	No of meeting attended	N/A- Activity to be done by the GBV Specialist

	national levels on the GBV (AoR) Area of Responsibility	accountability for the prevention, risk mitigation, and response to all forms of gender-based violence coordinated by MOLSAF					
<b>4</b>	<b>GBV/SEA SENSITIVE CHANNELS FOR REPORTING IN GM</b>						
4.1	Develop/Review GM for specific GBV/SEAH procedures	Undertake internal review of GM for GBV/SEAH reporting channels  Identify and Integrate GBV/SEAH entry points within the GM with clear procedures and tools for management of related complaints	Quarter 1	GBV Specialist / PIU	GBV Specialist	GBV/SEAH procedures integrated in the GM  Variety of reporting channels for GBV/SEAH identified	N/A- Activity to be done by the GBV Specialist

4.2	Train GM Operators on key protocols: referral, reporting and confidentiality	Develop training materials on GBV/SEAH reporting for GM Operators Conduct training of GM operators on GBV/SEAH	Quarter 1	GBV Specialist / PIU	GBV Specialist	GM Operators trained on GBV/SEAH protocols	Cost related to training included in GBV/SEAH training
<b>5</b>	<b>ESTABLISHMENT OF A GBV/SEA REPORTING PROTOCOL AND REFERRAL PATHWAY</b>						
5.1	Develop key protocols for GBV/SEAH reporting and management	Develop and update disclosure and reporting guidelines / protocol for GBV/ SEAH with provisions for confidentiality, informed consent and survivor protection and assistance.  Create reporting pathways that include support systems and accountability mechanisms including how	Quarter 1 and review periodically	GBV Specialist	GBV specialist/ WB	Number of GBV/SEA cases documented.  Number of referrals of SEAH incidents to the project GM/ by other service providers  % Of GBV/SEAH complaints resolved by type	N/A

		<p>to handle SEAH allegations properly</p> <p>Develop simple, anonymous and confidential tracking system that PSEA focal points can use to document GBV incidents to service providers.</p> <p>Review logs for GBV/SEAH documentation to ensure it follows standards for documenting</p> <p>GBV/SEAH cases provide GAP filling if Assessment of GBV providers reveals gaps.</p>				<p>Number of cases closed, and the average time they were open</p>	
6	<b>COMMUNICATION TO PROJECT AFFECTED COMMUNITIES ABOUT GBV/SEAH RISKS AND MECHANISMS</b>						

6.1	Community awareness on GBV/SEAH	<p>Conduct assessment on the effective IEC materials to be used by the community around project sites</p> <p>Create IEC materials on GBV/SEAH that targets everyone without discrimination and easy to comprehend.</p> <p>IEC available to communities in the local language</p> <p>Identification of child friendly and women safety areas for disclosure of information</p>	Quarter 1 And during project implementation	GBV Specialist	GBV specialist / Social Specialist	IEC materials created and disseminated with a gender perspective and translated	20,000
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		IEC materials to include information on GBV response services (such as hotline and where to get help).					
6.2	Communicate GBV/SEAH risks and options for reporting at the community level to create GBV awareness and enable project affected people to file complaints	Develop GBV/SEAH information guide including GM  Community awareness campaign on GBV/SEAH and GM reporting mechanism	Quarter 1	GBV Specialist	GBV specialist	Community awareness campaign developed in all project sites  Gender inclusion ensured in Community engagements  Number of community sensitization conducted	N/A- Activity to be done by the GBV Specialist
<b>7</b>	<b>CONDUCT GBV RISKS ASSESSMENTS AT PROJECT SITES</b>						
	Assess GBV risks in project sites	Develop/adaptation of safety audit tools	Before commencement of the project	GBV Specialist, PIU	GBV Specialist	Safety audit reports developed in all project sites	N/A- Activity to be done by

		Conduct periodic safety audits Include safety audit recommendations in project sub- components	Reviewed and updated every quarter			Safety audit recommendations in project sub-components	the GBV Specialist
<b>8</b>	<b>MAPPING OF SERVICE DELIVERY FOR GBV/SEA PREVENTION AND RESPONSE</b>						
	Develop and or/update a multisectoral GBV/SEA referral pathway(s)	<p>Mapped out GBV/SEA prevention and response service providers across Somaliland,</p> <p>Update a GBV/SEA referral list of preferred service providers as per the project site.</p> <p>Identify key gaps where remedial measures may be required (e.g., training staff on psychosocial first aid)</p>	1 Quarter	GBV Specialist	PIU / WB	<p>Referral pathway developed/updated</p> <p>Number/type of GBV/SEA preventive and response services available.</p>	N/A- Activity to be done by the GBV Specialist

		Regular quality assurance and evaluation					
<b>9</b>	<b>APPOINT GBV/SEAH FOCAL POINTS</b>						
	Identify, train and establish project focal points for GBV/SEAH	Development of ToR for GBV/SEAH focal point  Establish a trained, dedicated and committed network of project GBV focal persons	Quarter 1  Maintained throughout Project implementation.	PIU / GBV Specialist	PIU/ GBV Specialist	Focal Point ToR developed  No. of focal points and persons identified and trained	N/A- Activity to be done by the GBV Specialist
<b>10</b>	<b>ESTABLISH A GBV/SEA ACCOUNTABILITY FRAMEWORK</b>						
	Develop and accountability framework	Develop protocol with specific roles and responsibilities for parties on verification, investigation and management of cases within Government and IPs	1 Quarter	GBV Specialist / PIU / IPs	PIU / WB	Accountability framework developed	N/A- Activity to be done by the GBV Specialist

		Develop specific sanctions as per type of GBV violation					
<b>11</b>	<b>ESTABLISH AN M&amp;E SYSTEM OF THE GBV/SEAH PLAN</b>						
	Develop a supervision Plan of SEAH prevention and response action plan	<p>Develop a comprehensive M&amp;E plan to monitor work plan implementation</p> <p>Monitor GBV/SEAH Implementation Plan</p> <p>Undertake regular M/E of progress on SEA/SH prevention and response activities, including reassessment of risks as appropriate</p> <p>Conduct field visits</p>	Quarterly Maintained throughout Project implementation.	GBV Specialist / M&E Specialist / PIU	GBV Specialist / M&E Specialist / PIU/WB	<p>M&amp;E framework developed</p> <p>Monitoring reports produced</p> <p>Field Visits conducted/Reports</p> <p>GBV/SEAH M/E plan Reviewed</p> <p>Quarterly Reports Conducted</p>	N/A- Activity to be done by the GBV Specialist

		Review quarterly the action plan and progress against indicators listed						
<b>Total</b>								<b>\$70,000</b>

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- 4) UNFPA Somaliland. (2020). Gender-Based Violence and Harmful Practices in Somaliland: Situational Assessment. Hargeisa: UNFPA.
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