



Sindh Floods Emergency Housing Reconstruction Project

GENDER & SEA/SH ACTION PLAN

August 2023

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ABBREVIATIONS & ACRONYMS

CEDAW	Convention on the Elimination of Discrimination against Women
CoC	Code of Conduct
GBV	Gender-based Violence
GFP	Gender Focal Person
GoS	Government of Sindh
GRM	Grievance Redressal Mechanism
IP	Implementing Partner
MFIs	Micro-Finance Institutions
M&E	Monitoring and Evaluation
NGO	Non-Government Organization
PIU	Project Implementation Unit
POs	Partner Organizations
SEA	Sexual Exploitation and Abuse
SFEHRP	Sindh Floods Emergency Housing Reconstruction Project
SH	Sexual Harassment
SPHF	Sindh Peoples Housing for Flood Affectees
UN	United Nations
UNCRC	United Nations Convention on the Rights of the Child
VAC	Violence against Children
WB	World Bank

1 Introduction

Sindh has been disproportionately affected by the 2022 floods, where the breadth of disaster has damaged or destroyed over 1.8 million houses, and 3.9 million hectares of agricultural land, further resulting in the loss of over 747 lives and the injuring of 8,422 others. Furthermore, based on preliminary estimates, over 1.75 million houses were partially or fully damaged during the 2022 floods, representing over 20% of the entire province's houses¹.

As part of a consolidated effort for emergency rehabilitation of the flood affectees, the Government of Sindh (GoS) has partnered with the World Bank (WB) to implement the "Sindh Floods Emergency Housing Reconstruction Project" (SFEHRP). As part of this, a separate company under Section 42 has been established for the design and execution of the program (namely, the Sindh Peoples Housing for Flood Affectees – SPHF), which will also serve as the Project Implementation Unit (PIU) for this project.

In compliance with World Bank (WB) requirements, SPHF has prepared this Gender Action Plan to promulgate a systematic and result based approach for including and integrating considerations based on gender, with a focus on women empowerment, in all project activities. This Gender Action Plan will ensure that the specific needs and concerns of women, and other vulnerable groups are not only highlighted but also addressed through the provision of different measures during project implementation.

The need for this Gender Action Plan emerged from an initial assessment carried out at the appraisal stage of the project that showed that the risk rating for Sexual Assault & Sexual Harassment, & Violence Against Children (SEA/SH and VAC) is 'substantial'. As per the World Bank's Good Practice Note on Addressing SEA/SH², a SEA/SH Prevention and Response Action Plan needs to be developed for projects that are moderate, substantial or high risk. In line with the requirement, this Plan details the operational measures that will be put in place to incorporate women into the overall rehabilitation efforts and to also prevent, and respond to incidents of SEA/SH and VAC.

1.1 Disproportionate Impacts on Women from Natural Disasters³

The impact of disasters caused by natural hazards is not gender neutral. A 20-year study on the gendered nature of natural disasters shows that in societies where the socioeconomic status of women is low, natural disasters kill more women than men, both directly and indirectly through related post-disaster events. The reason for this difference lies in the fact that women in general have lower socioeconomic status which, in turn, leads to unequal access to opportunities and unequal exposure to risks, making them more vulnerable to natural disasters⁴.

Women also have limited access to economic resources as well as information and technology, increasing their vulnerability and adaptive capacity to disaster. Traditional expectations and home-care responsibilities limit women's mobility and opportunities for political involvement, education, access to markets, and a myriad of other resources – the lack of which reinforces the cycle of vulnerability. Inheritance laws and traditions, marriage

¹ SFEHRP Project Appraisal Document

² World Bank's Good Practice Note on Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works (Second Edition, February 2020)

³ Gender-inclusive disaster risk management - asian development bank. (n.d.).

⁴ E. Neumayer and T. Plümper. 2007. The Gendered Nature of Natural Disasters: The Impact of Catastrophic Events on the Gender Gap in Life Expectancy, 1981–2002. *Annals of the Association of American Geographers*. 97 (3). pp. 551–566. The paper is available online at [http://eprints.lse.ac.uk/3040/1/Gendered_nature_of_natural_disasters_\(LSERO\).pdf](http://eprints.lse.ac.uk/3040/1/Gendered_nature_of_natural_disasters_(LSERO).pdf)

arrangements, banking systems, and social patterns that reinforce women's dependence on males all contribute to their unfavorable access to resources and their lack of power to change things.

A key gendered impact of disaster is women's increased post disaster workload, where women are often in the frontline re-establishing households in relocated or reconstructed sites and collecting basic household needs such as water, food, hygiene items, and fuel. Such engagements deter the development of women's skills, education, and various livelihood opportunities. The immediate impact of disasters and through them the disruption of existing social protection mechanisms may expose women and girls to devastating, long term effects and consequences. These may include early and forced marriages, trauma, increased vulnerability to gender-based violence, exposure to sexually transmitted infections, unintended pregnancies, and loss of education and livelihood opportunities. Failure to apply a gender lens in disaster risk management and response can reinforce or perpetuate these social consequences on women and girls.

1.2 Strengthening Resilience to Disasters through Women's Empowerment

Engaging and empowering women are beneficial means of strengthening resilience to disaster risks. Just as gender roles and relations shape vulnerability to disaster, conversely, they also shape people's capacity to prepare, withstand, and recover. Women have particular experience and skills to contribute to disaster risk management due to their role as primary caregivers within the family and often within the wider community. They have strong local knowledge of natural resources, surroundings, and valuable knowledge of natural resources, surroundings, and valuable links with others in the area. If women's specific perspectives and experiences are not factored into disaster risk management and response, then that knowledge is lost.

1.3 Summary Description of the Project

SFEHRP aims to deliver owner-driven, multi-hazard resilient reconstruction of core housing units affected by the 2022 floods in selected districts of Sindh, where the project has been planned with 03 components:

1. Component 1 – Housing Reconstruction Grants
2. Component 2 – Institutional Strengthening & Technical Assistance
3. Component 3 – Project Management & Implementation Support

Where a brief description of each of the components is given below:

Component 1: Housing Reconstruction Grants

This component will support the provision of cash grants to homeowners for the reconstruction or restoration of damaged houses. The grant would finance (a) the replacement of a destroyed house with new multi-hazard resilient core units, or (b) restoration and strengthening of a damaged house to acceptable resilient standards. The rebuilding will be owner driven, where grants will be released directly to the beneficiary's bank account in tranches, linked to the stages of construction and adoption of multi-hazard resilient standards.

Cash grants under this component will fund the reconstruction and restoration of approximately 350,000 units, which represent about 20% of the total housing reconstruction needs.

Component 2: Institutional Strengthening and Technical Assistance

Work under this component has been divided into three sub-components:

1. Subcomponent 2.1: Detailed Damage Assessment & Eligibility Verification Survey – A survey will be conducted to (a) categorize the level of damage to each housing unit through an engineered assessment via a standardized checklist, (b) establish a status of land ownership, (c) classify the level of hazard risk for the site, and (d) establish lists of eligible beneficiaries and vulnerable individuals or households that are unable to prove their identity and/ or property ownership.
2. Subcomponent 2.2: Technical Assistance for Reconstruction Program – This component will provide technical assistance to support the housing reconstruction efforts including the formulation of a housing reconstruction strategy, development of multi-hazard resilient housing solutions, and skills training programs for communities and artisans including resilient construction practices. Women and female headed households will also be trained in financial management and supervision of construction activities.
3. Subcomponent 2.3: Implementation Support through Partner Organizations – This component will assist in enhancing the public sector's delivery capacity through partnerships with reputable POs which will be NGOs with existing outreach at a community level and proven track record of delivering disaster reconstruction programs.

Component 3: Project Management & Implementation Support

This component will support the management and implementation of the project, including the establishment and operationalization of an empowered implementation agency by the Government of Sindh. The activities supported will include (a) incremental operating costs including recruitment of incremental operating staff and individual consultants as required, (b) consultancy firm costs, and (c) expenditures on fiduciary systems, environmental and social management requirements, communications, and setting up of a Grievance Redressal Mechanism (GRM).

2 Assessment of Key Gender Risks

A definition of the key terms that will be used moving forward is given below:

Table 2.1 - Definition of Key Terms

Term	Definition
Gender-based Violence	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. ⁵
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. ⁶
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. ⁷
Sexual harassment	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. While typically involving a pattern of behavior, it can take the form of a single incident. Sexual harassment may occur between persons of the opposite or same sex. Both males and females can be either the victims or the offenders. ⁸

2.1 Identification of Risks

During humanitarian crises or emergencies, much like the floods of 2022 in Pakistan, the rate, and possibilities of sexual and gender-based violence increase. This indicates that an alarming number of women and girls become targets of attacks including rape, sexual assault, forced marriage, domestic violence, and the denial of basic resources. Factors that would also affect men and boys (minors), such as unequal power relations, differential value systems, and structural inequalities, would disproportionately affect women and girls and exacerbate their experience in conflict and displaced settings.

Similar risks have been envisaged in the implementation of this project, where, with the information available at this stage, an overall identification of risks has been provided below:

⁵ Inter-Agency Standing Committee Guidelines, 2015

⁶ United Nations Glossary on Sexual Exploitation and Abuse, 2017

⁷ United Nations Glossary on Sexual Exploitation and Abuse, 2017

⁸ UN Women <https://www.un.org/womenwatch/uncoordinated/antiharassment.html>

Table 2.2 - Identification of Risks

S. No.	Risks Identified	Rating
1.	Availability of required documents such as CNIC and other legal documents to get land ownership and entitlements of the reconstructed houses tie women to households	High
2.	General/ cultural behaviours of men towards women participating in training specially participation of women participants in training of masons and craft persons, getting land ownership and legal entitlements of land, and other project activities	High
3.	The capacity of Implementing Partners to understand gender issues and successfully implement the project within the specified gender guidelines	Medium
4.	Construction contractors and craft persons are likely to lack awareness and knowledge about national/local laws regarding SEA/SH and VAC and the consequences of any untoward behaviour.	Medium
5.	Women headed households and other vulnerable groups by nature of their ethnicity, race, religion, caste, or creed may also face increased exposure to these risks as their basic access to humanitarian services such as food, water, and health care is hampered by pre-existing perceptions and societal attitudes about gender roles.	Medium
6.	Given the low level of literacy, project-affected communities are unlikely to be aware of their rights regarding SEA/SH and VAC related violations or know how to access channels to seek justice and redress.	Medium
7.	Weak protection mechanisms for vulnerable groups, compounded by a lack of coordination among different GBV response actors may lead to delays and lapses in offering support to victims of violence.	Medium
8.	Ownership and transfer of land titles to the women beneficiaries	High
9.	Construction work as women and children are residing in insecure living environments and have limited access to privacy or safe toilet facilities, etc.	High
10.	Displaced persons and families face extreme conflict related economic stress and may negatively cope by trading their daughters to survive. These girls who are married young do not often complete their education and are at increased risk of bodily harm.	High
11.	Underage girls in the communities may be lured into marriage by different crafts-persons. If they belong to religious minority communities, the issue of forced conversion can also arise.	High

These risks may in general be mitigated through the implementation of the following measures:

- Capacity building of IPs and on gender related aspects and how to deal with gender issues
- Investing in awareness raising of the communities to facilitate women to fulfil legal requirements of land entitlements and participate in the project activities i.e. training and opening bank accounts etc.
- Informing all project beneficiaries of the project GRM and how to use it
- Consult and coordinate with the relevant government departments and other stakeholders to address GBV-related issues in the affected communities (if any)
- Conduct regular consultations with affectees through IPs to understand their issues and devise solutions accordingly

3 Proposed Gender Action Plan

To prevent and mitigate the risks identified in the previous section, and to promote a more gender inclusive and sensitive development for the project, the following measures (for details see Table 3.1) will be undertaken:

Table 3.1 – Gender Action Plan

Project component falls under (1 or 2 or 3)	Output	Objective	Results Indicators	Actions Required/ Activities	Responsibility	Time Frame
Component 1 Housing Reconstruction Grants	1.1 Women's access to financial assistance for beneficiary-driven reconstruction of multi-hazard resilient houses	Provide financial assistance to affectees, especially vulnerable groups such as women HHs, with the financial assistance needed to benefit from the project	<ul style="list-style-type: none"> Core housing units reconstructed/ restored to multi-hazard resilient standards, of which at least 25 % are for women-headed households (<i>RF indicator</i>) No. of women participants (15% of total beneficiaries) attending training and orientation sessions (<i>RF indicator</i>) Training reports prepared Housing subsidy cash grant recipients who are female. 50 (Percentage) (<i>RF indicator</i>) X Number of WASH facilities to be supported by out of which 50% will be for female households. 	<ul style="list-style-type: none"> Identification of vulnerable groups (i.e. women-headed households, etc.) who are eligible for this grant. IPs will conduct a 'Damage Assessment and Verification Survey' for this purpose. Provide cash grants with a focus on women-headed households, widows, single, persons with special needs disabilities, and other vulnerable groups in project-targeted districts Organize training for women on: <ul style="list-style-type: none"> ✓ Beneficiary-driven reconstruction of houses and reconstruction guidelines. ✓ supervision, or maintenance of emerging household technologies (water harvesting and solar solutions) through training ✓ financial management and supervision to ensure the reconstruction process is completed on time and within the budget ✓ Organize training of craft persons (Masons) to ensure the reconstruction 	<ul style="list-style-type: none"> IPs & their GFPs SPHF Management & Ips Management 	<p>During project implementation</p> <p>During project implementation</p>

Project component falls under (1 or 2 or 3)	Output	Objective	Results Indicators	Actions Required/ Activities	Responsibility	Time Frame
				<p>process is completed on time and within budget</p> <ul style="list-style-type: none"> Facilitate IPs to develop a social mobilization strategy to mobilize communities including influencers and gatekeepers to support labor-constrained women to complete the construction on time, within budget, and of quality standards. 		
	1.2 Reforms for land titles of women beneficiaries	Coordination with Government Departments to facilitate women beneficiaries to ensure that they do not face further issues in terms of land entitlements	<ul style="list-style-type: none"> Meeting minutes Concept note/ strategy documents Reports of workshops and seminars <p>No. of women-headed households with land ownership validated.</p>	<ul style="list-style-type: none"> Conduct Policy dialogues and meetings with relevant departments and other stakeholders Develop linkages with relevant departments of GOS and other organizations on land ownership and land titles to the women beneficiaries Aid vulnerable women beneficiaries in demonstrating property entitlement, where there is a lack of legal documents held by women and other vulnerable individuals, assistance will be sought through community-based land adjudication processes and coordination with NADRA for issuance of documents. Provide information to men and women during consultations of the affected households on the 	<ul style="list-style-type: none"> SPHF & Ips Management 	During Project Implementation

Project component falls under (1 or 2 or 3)	Output	Objective	Results Indicators	Actions Required/ Activities	Responsibility	Time Frame
				importance of land title ship for women.		
Component 2 Institutional Strengthening & Technical Assistance	2.1 Capacity enhancement and sensitization of SFEHRP and SPHF, staff on gender-related safeguards	To ensure the implementation of gender sensitization and safeguarding practices by increasing the capacity of SPHF and SFEHRP staff	<ul style="list-style-type: none"> No. of training modules and other materials developed. No. of Training conducted No. of training reports generated List of participants who attended training (gender-disaggregated data) 	<ul style="list-style-type: none"> Develop Training manuals/ material on: Concepts of Gender, Gender mainstreaming, Gender Action Plan, Gender Based Violence (GBV), Sexual Harassment, and Grievance Redressals Mechanism (GRM) Train project staff to facilitate women's participation in project activities through effective social mobilization and stakeholder engagement i.e. women and men community members, elders and influentials at a community level. Provide sensitization and awareness training to communities on GBV, Child Marriages and Girls' Education through stakeholder engagement. 	<ul style="list-style-type: none"> Gender Specialist SPHF IPs Management & Gender Focal Persons 	During Project Implementation
	2.2 Technical assistance for the construction of beneficiary-driven multi-hazard resilient houses	Increase the capacity of flood affectees, especially vulnerable groups such as women headed households, to get benefit from the	<ul style="list-style-type: none"> No. of bank accounts opened for vulnerable women beneficiaries No. of women attended training No. of training reports prepared 	<ul style="list-style-type: none"> Support IPs to prepare action plan to facilitate vulnerable women beneficiaries (i.e. women, headed households, persons with special needs, and single persons who are eligible for the grant). Some of the actions include: <ol style="list-style-type: none"> Preparation of a list of 	<ul style="list-style-type: none"> Gender Specialist SPHF IPs & their GFPs 	During Project Implementation

Project component falls under (1 or 2 or 3)	Output	Objective	Results Indicators	Actions Required/ Activities	Responsibility	Time Frame
		project interventions and effectively participate in the project activities including the reconstruction process		vulnerable groups to identify vulnerable groups b) Facilitating women beneficiaries for the opening of bank accounts by providing information on the process of opening a bank account, and payment procedures for receiving cash grants, c) coordination with banks, d) Engagement with male family/ community members etc.	<ul style="list-style-type: none"> SPHF Gender Specialist & Management 	
	2.3 Reduce the vulnerability of women beneficiaries from potential relevant disasters	To capacitate women to better understand disaster preparedness, management, and adaptation by acquiring new skills	<ul style="list-style-type: none"> Awareness-raising material prepared and disseminated amongst communities No. of capacity building events and its reports No. of women beneficiaries trained to earn additional income through training provided. 	<ul style="list-style-type: none"> Develop awareness-raising material for women on floods and other potential disasters in local languages and cater to women with limited or no literacy. Organize public awareness campaigns and sessions on flood awareness and other disasters for women beneficiaries in safe locations and at convenient times of women. Organize training sessions for women and involve them in the construction process to learn skills (i.e. mason training) that may be used for further income generation activities. All training will be conducted at a 	<ul style="list-style-type: none"> SPHF Gender Specialist IPs GFPs 	During Project Implementation

Project component falls under (1 or 2 or 3)	Output	Objective	Results Indicators	Actions Required/ Activities	Responsibility	Time Frame
				convenient time and location, where female trainers will also be present.		
	2.4 Access to women beneficiaries on Grievance Redress Mechanism (GRM)	To establish a system where women register and resolve their grievances in a safe and secure environment.	<ul style="list-style-type: none"> • GRM guidelines in local language and mechanisms in place • No. of awareness-raising sessions conducted • No: of grievances received and resolved. • Actions taken by IPs/SPHF to address and resolve grievances 	<ul style="list-style-type: none"> • Establishment of a Grievance Redress system (GRS) and Gender Help Desks • Develop Guidelines for GRM in the local language • Conduct training and awareness-raising+ sessions for women beneficiaries on GRM • Record keeping and process of handling the grievances 	<ul style="list-style-type: none"> • SPHF Gender Specialist • SPHF Social Development Specialist • IPs GFP 	During Project Implementation
Component 3 Project Management & Implementation Support	3.1 Gender inclusive and sensitive working environment at SPHF and project Implementing Partners levels	To ensure that policies and mechanisms are in place to create an enabling environment for gender and social inclusion	<ul style="list-style-type: none"> • Development of Gender Policy for the project • Training reports • Approved and notified harassment and grievances redressals committee(s) at SPHF and IPs level • Proceedings/ minutes of H&GRC • Notifications of designated Gender Focal Persons 	<ul style="list-style-type: none"> • Develop gender policy by conducting staff consultations and document reviews • Provide training to staff on implementation mechanisms of gender policy • Formation and issuing notification of the Harassment and grievance redressals committee (H&GRC) at the SPHF level • Provide information to all the staff members about H&GRC composition and roles and 	<ul style="list-style-type: none"> • Gender Specialist SPHF • SPHF Management • GFPs (IPs) • SPHF & IPs management 	At the project Inception level

Project component falls under (1 or 2 or 3)	Output	Objective	Results Indicators	Actions Required/ Activities	Responsibility	Time Frame
			<ul style="list-style-type: none"> XXXX female staff at both SPHF and IPs levels 	responsibilities through the dissemination of information <ul style="list-style-type: none"> Appoint Gender Focal Persons (GFPs), prepare job descriptions, and conduct orientation of GFPs by IPs Review the existing status of female employment at the IP level and provide orientation and information about project targets related to X% of female staff to be achieved by IP. 		

4 SEA/SH Plan

Since the SEA/SH risk of the project is 'Substantial', SPHF has incorporated it in the GAP, to ensure that the SEA/SH related performance of the project remains streamlined throughout. This action plan includes: a) prevention and mitigation actions including information dissemination strategy targeting workers and communities; GBV service providers and response protocol; reference to SEA/SH reporting and allegation procedures to be developed; and reference to accountability and response framework. For details see Table 3.2.

Table 43.2 – SEA/SH Plan

Component	Output	Objective	Result Indicators	Action Required/ Activities	Responsibility	Time frame
2 & 3	Prevent project beneficiaries from possible risks of SEA/ SH in the project areas	To prevent and identify any practices that may lead to SEA/ SH in the project areas	<ul style="list-style-type: none"> Communication and awareness raising material No. of awareness sessions held in project areas Resource directory/ list of service providers in the targeted districts Copy of Code of Conduct in English and Sindhi Signed Code of Conduct 	<ul style="list-style-type: none"> Identify the potential risks and practices in the communities about sexual exploitation and abuse including child abuse in the project areas through stakeholder consultations (i.e. beneficiaries, IPs, government department, etc.) Develop communication material and organize awareness-raising sessions in the communities to inform about the concept of SEA/SH and project commitment and policies. Mapping the existing services of government and CSOs operating in the targeted districts and informing about the services to communities Prepare a code of conduct for all stakeholders (i.e. Project Staff, IPs, Consultants, Contractors) who directly engage with the communities, particularly women, girls, and boys. The code of conduct should be signed by all the stakeholders 	Responsibility Gender Specialist SPHF IP Staff	At Inception level (1 st year of the project)

Component	Output	Objective	Result Indicators	Action Required/ Activities	Responsibility	Time frame
				<ul style="list-style-type: none"> Translation of Code of Conduct in local language and provide information to beneficiaries 		
Component 2&£	The capacity of project stakeholders and beneficiaries developed to better respond to SEA/ SH issues in the project areas	To provide awareness and training to implementing partners and project beneficiaries to better understand the concept of SEA, and its consequences and establish linkages with response mechanisms for stakeholders and beneficiaries	<ul style="list-style-type: none"> Awareness and training materials Reports of training events SEA/SH integration in contracts, Human Resource/ Staff rules and manuals 	<ul style="list-style-type: none"> Design training manual and awareness material on SEA/ SH Provide awareness and training to VRCs (women and men) on SEAH/SH highlighting its causes, consequences, and the management and response to SEAH to all stakeholders including project staff, IPs, and other stakeholders. Review the Human Resource manuals Contractors' and consultants' contracts 	Gender Specialist SPHF IP Staff Consultant	Project implementation level
	Referral mechanisms/ pathways are described and communicated to project stakeholders and beneficiaries	To describe referral pathways and grievance redress services and provide information to project stakeholders and beneficiaries	<ul style="list-style-type: none"> Communication material on referral pathway and WB Grievances redress services developed and disseminated to project stakeholders and beneficiaries Notification of SEAH/SH committee 	<ul style="list-style-type: none"> Define referral pathways to provide support to survivors of SEAH/ SH (if any) i.e. police, legal, medical assistance, etc Engage with service providers to inform them about project objectives, particularly SEA/ SH 	Gender Specialist SPHF Consultant IP Staff	Project implementation level

Component	Output	Objective	Result Indicators	Action Required/ Activities	Responsibility	Time frame
			<p>or internal focal point in charge of reporting SEAH/SH</p> <ul style="list-style-type: none"> Information about WB Grievances redress services disseminated to stakeholders and beneficiaries 	<ul style="list-style-type: none"> Prepare in-house (project level) response mechanisms at the project and IP level, designate focal persons, and prepare guidelines for reporting and redressal mechanisms. Widely disseminate information among beneficiaries and stakeholders about in-house mechanisms and World Bank Grievances redress services and how to report through different channels. 		
	A monitoring and reporting system is established to address SEA/SH issues	Enable project staff and IPs to monitor, follow up, and compile reports of SEA/SH matters	<ul style="list-style-type: none"> Monitoring and reporting formats developed and communicated to project and IP staff Monitoring reports Progress reports containing feedback from communities 	<ul style="list-style-type: none"> Develop a monitoring system to compile the reported cases and categorize them into various forms of SEA/ SH such as child sexual abuse Record and evaluate the effectiveness of the various support systems to respond Collect feedback from the communities from time to time to improve the response mechanisms (if required) 	Gender Specialist SPHF M&E Staff SPHF IP Staff	Project implementation level

5 Monitoring, Evaluation, & Reporting

A third-party monitoring firm will be brought on board to monitor the GAP's implementation and effectiveness for the project. The gender specialist SPHF will oversee, guide, and coordinate gender related measures within the programme and ensure the successful implementation of the GAP. Moreover, the gender specialist will also be responsible for overseeing the monitoring and reporting of the GAP.

Further responsibilities may include:

- Liaison with all program stakeholders.
- Responsible for overseeing program communication and stakeholder engagement related to gender.
- Review of project policy documents, contracts, guidelines, publications, communication, and IEC material to ensure effective gender mainstreaming and gender Lens
- Develop linkages with the Women Development Department, UN Women and other relevant working groups at local and provincial levels for collaboration on community outreach, information dissemination, and other program activities.
- Dissemination of information on the grievance redress mechanism (GRM) to Implementing Partners and project women beneficiaries
- Overseeing (implementing, monitoring, and reporting) the gender action plan
- Monitoring program progress, including the targets and achievements set out in the gender action plan and project implementation plan.

ANNEXURES

Annex I: Code of Conduct

This Code of Conduct applies to all staff, consultants, Implementing Partners, & Partner Organizations, associated with the Sindh Floods Emergency Housing Reconstruction Project (SFEHRP) and the Sindh Peoples Housing For Flood Affectees (SPHF). It defines standards of behaviour expected by the management of SPHF to prevent SEA/SH.

Individual Code of Conduct: Preventing Sexual Exploitation and Abuse, Sexual Harassment

I, [full name of employee], acknowledge that preventing Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) is important. SEA/SH activities constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or potential termination of employment. All forms of SEA/SH are unacceptable, be it on the work site, the work site surroundings, or at workers' camps. Prosecution of those who commit SEA/SH may be pursued if needed.

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

- i. Treat women, men, and children (persons under 18 years of age) with respect and not discriminate on the basis of sex, age, disability, race, ethnic origin, language, religion or political opinion.
- ii. Not use language or behavior towards women, men, or children that is inappropriate, harassing, physically or sexually abusive, sexually provocative, demeaning or culturally inappropriate.
- iii. Not engage in sexual relationships with members of project-affected communities, either during or after working hours.
- iv. Not make unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature towards work personnel or staff. This includes looking somebody up and down; touching someone inappropriately; howling or smacking sounds; hanging around somebody; whistling and catcalling; sending inappropriate text messages or images, and in some instances, giving personal gifts.
- v. Not take pictures or make videos of anyone, especially women and children without their consent (see also 'use of children's images for work-related purposes', below).
- vi. Not engage in sexual favors, for example making promises of favorable treatment (such as the promise of employment or promotion) threats of unfavorable treatment (loss of job) or payments in kind or in cash, dependent on sexual acts, or other forms of humiliating, degrading or exploitative behavior.
- vii. Not accept, solicit or engage in the "buying" of or profiting from sexual services. This is applicable both within and outside of working hours.

With regard to children under the age of 18:

- viii. Wherever possible, ensure that another adult is present when working in the proximity of children. Where circumstances require a one-on-one interaction ensure that such interaction is visible by at least one other adult at all times.
- ix. Not use language or behavior towards children that are inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- x. Never engage in any sexual activity with children (persons under the age of 18) regardless of the age of majority or age of marital consent locally. Sexual activity with children is prohibited (including by way of contracting marriage unless there is a pre-existing marriage). Mistaken belief in the age of a child is not a defense.

- xi. Not invite unaccompanied children into my camp/home, unless they are at immediate risk of injury or in physical danger.
- xii. Not sleep close to unsupervised children unless absolutely necessary, in which case I must obtain my supervisor's permission, and ensure that another adult is present, if possible.
- xiii. Use any computers, mobile phones, or video and digital cameras appropriately, and never exploit or harass children or access child exploitation material through any medium (see also 'use of children's images for work-related purposes', below).
- xiv. Do Not use physical punishment on children.

When photographing or filming a child or using children's images for work-related purposes, I must:

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

With respect to training and reporting

- xx. Attend and actively partake in training courses related to SEA/SH as mandated by my employer.
- xxi. Report through the Grievance Redress Mechanism or to my supervisor/manager any suspected or actual SEA/SH by a fellow worker on this project, whether employed by my company or not, or any breaches of this Code of Conduct.
- xxii. Not retaliate against workers who report violations of the Code, if that report is made in good faith.

Sanctions

I understand that if I breach this Individual Code of Conduct, my employer will take disciplinary action, which could include:

- Informal warning
- Formal warning
- Loss of up to one week's salary
- Suspension of employment (without payment of salary), for a minimum period of one month up to a maximum of six months
- Termination of employment
- Report to the police, if deemed necessary

I hereby acknowledge that I have received and read the contents of the above Individual Code of Conduct: Preventing SEA/SH, and a failure to comply may lead to disciplinary action, legal action, or criminal investigation and prosecution.

Signature: _____
Printed Name: _____
Title: _____
Date: _____

Annex II: Overview of Legislation

1. International Commitments

1.1 Convention on the Elimination of all Forms of Discrimination against Women (CEDAW)

Pakistan ratified CEDAW in 1996, which calls upon state parties to condemn discrimination against women in all its forms and places an obligation on states to take all appropriate measures to eliminate such discrimination by any person, organization, or enterprise. The U.N. Committee on the Elimination of Discrimination Against Women (CEDAW Committee), established under CEDAW, has noted that "gender-based violence is a form of discrimination which seriously inhibits women's ability to enjoy rights and freedoms on a basis of equality with men"⁹.

1.2 United Nations Convention on the Rights of the Child (UNCRC)

In 1990 Pakistan ratified UNCRC, and its Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography in 2011. UNCRC obligates State Parties to protect children from all forms of sexual exploitation and sexual abuse and take measures to prevent: a) the inducement or coercion of a child to engage in any unlawful sexual activity; (b) exploitative use of children in prostitution or other unlawful sexual practices; (c) exploitative use of children in pornographic performances and materials.

2. National Laws

2.1 Protection Against Harassment of Women at the Workplace (Amendment) Act, 2022

The Protection against Harassment of Women at the Workplace Act, 2022 introduced amendments in the previous Act of 2010, and has further broadened its scope. The Act defines harassment as (a) "any unwelcome sexual advance, request for sexual favors, stalking or cyber stalking, or other verbal, visual or written communication or physical conduct of a sexual nature, or sexually demeaning attitudes, including any gestures or expression conveying derogatory connotation causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment"; and (b) "discrimination on the basis of gender which may or may not be sexual in nature, but which may embody discriminatory and pre-judicial mind-set or notion, resulting in discriminatory behaviour on basis of gender against the complainant".

Upon receiving a complaint, the employer is required to set up an Inquiry Committee consisting of three members, of which one must be a female. The complainant also has the option to complain directly to the Ombudsperson. If the Inquiry Committee finds the accused to be guilty, it can impose penalties such as censure; withholding for a specific period promotion or increment; recovery of the compensation payable to the complainant from

⁹ General Recommendation No. 19

pay or any other source of the accused; reduction to a lower post; compulsory retirement; and removal from service.

2.2 Prevention of Anti-Women Practices (Criminal Law Amendment) Act, 2011

The law defines and prohibits certain practices that may lead to exploitation and discrimination against womenfolk. The practices defined and prohibited in the Act include:

- Prohibition of depriving women from inheriting property – Those denying women of their movable or immovable properties at the time of opening of succession shall be punished with imprisonment of either description for a term which may extend to ten years but not be less than five years or with a fine of one million rupees or both.
- Prohibition of forced marriage – Those who coerce women in any manner to enter into marriage shall be punished with imprisonment of either description for a term, which may extend to ten years or for a term which shall not be less than three years and shall also be liable to fine of five hundred thousand rupees.
- Prohibition of marriage with the Holy Quran – Those who compel or facilitate the marriage of a woman with the Holy Quran shall be punished with imprisonment of either description which may extend to seven years which shall not be less than three years and shall be liable to a fine of five hundred thousand rupees.

2.3 Pakistan Penal Code, 1860: Section 376: Punishment for Rape

Under Section 376 of the Pakistan Penal Code, 1860 amended under the Criminal Law Amendment Act, 2020; any person who commits rape will be punished with death or life imprisonment without parole till death, and will also be liable to a fine. Similarly, in the case of gang rape, where two or more persons are involved, the punishment for each person is death or life imprisonment without parole till death.

2.4 Other Provisions in the Pakistan Penal Code, 1860¹⁰:

- Under Section 509 of the Pakistan Penal Code, if a person insults a woman regarding her modesty, whether through gestures or words, the perpetrator can be charged with three years of imprisonment, or with a fine, or both.
- Under Section 496C of the Pakistan Penal Code, anyone making false accusations against another female is to be punished with five years in prison and with a fine.
- A person who does something that is considered indecent and vulgar, including singing or reciting a song with vulgar lyrics, shall be liable under Section 354A of the Pakistan Penal Code and shall be imprisoned for three months or may be given a fine or be ordered to do both.
- A person who assaults a woman, uses physical force against her, or strips her of her clothes for the public to see, may be given a death sentence or imprisoned for life, under Section 354A of the Pakistan Penal Code.
- A person who forces a young girl under the age of 18 to have sexual intercourse with another person, will be charged with 10 years of imprisonment or with a fine under Section 366A of the Pakistan Penal Code.

¹⁰ <https://courtingthelaw.com/2019/06/10/commentary/anti-harassment-laws-in-pakistan/>

3. Provincial Laws

3.1. Sindh Child Marriages Restraint Act, 2013

The Sindh Child Marriages Restraint Act, 2013 prohibits marriage with a child i.e. any male or female who is under 18 years of age. The Act states that “whoever, being a male above eighteen years of age, contracts a child marriage shall be punished with rigorous imprisonment which may extend to three years but shall not be less than two years and shall be liable to fine”. The same punishment is also prescribed for a person who “performs, conducts, directs, brings about or in any way facilitates any child marriage”; and parent or guardian who “does any act to promote the child marriage or permits it to be solemnized, or fails to prevent it negligently, from being solemnized”.

3.2. Sindh Hindus Marriage Act 2016

The Act strives to ensure that the fundamental right to family is guaranteed to all under the Constitution of Pakistan by defining a uniform mechanism for registration of Hindu marriages.

The Act defines:

- The conditions for the marriage - ensuring that both individuals are consenting, of legal age, and are not prohibited within the degree of the relationship.
- The ceremonies of the marriage
- The registration of the marriage
- The manner of registration

3.3. Sindh Domestic Violence Prevention Act 2013

The Act serves to institutionalize measures which prevent and protect women, children, and other vulnerable persons from domestic violence and similar matters, whilst also defining the measures for punishment and penalization of offenders, and the protection of victims.