
ESWATINI WATER SUPPLY AND SANITATION ACCESS PROJECT



SEXUAL EXPLOITATION AND GENDER BASED VIOLENCE PREVENTION AND RESPONSE ACTION PLAN

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1 Introduction

Project create changes in the communities in which they operate and cause shifts in power dynamics between community members and within households. Sexual Exploitation/Sexual Harassment and Gender Based Violence can be triggered by labour influx on the project when workers are believed to be interacting with community women.

1.1 Objectives

- To discuss strategies and support mechanisms to mitigate the risk of and respond to allegations of gender-based violence (GBV), including sexual exploitation and abuse and sexual harassment.
- To provide guidance for adapting the GRM to allow for the uptake, management, and resolution of SEA and GBV allegations.

During the compilation of the Environmental and Social Management Plan (ESMP) for the Eswatini Water Supply and Sanitation Access Project, the following risks were identified accompanied by mitigation measures in as far as the health and safety of citizens are within the project area.

As a result of the above stated, this SEA Prevention and Response Action Plan is adopted by the Eswatini Water Supply and Sanitation Access Project (EWSSAP) as SEA and GBV grievances need to be specifically addressed in the project's Grievance Redress Mechanism (GRM), which includes management of HIV/AIDS-related issues. The SEA Plan will be implemented by the Nhlengano AIDS Training Information and Counselling Centre (NATICC) and monitored by EWSC. NATICC is a faith-based, non-profit, Non-Governmental Organization that provides information, training, and counseling on HIV/AIDS in Nhlengano.

The Organization works closely with the government of Eswatini and other non-governmental Organizations to prevent and respond to gender-based violence (GBV) in communities in the Shiselweni Region of Eswatini. NATICC had mainly been working on

HIV Prevention Care and Support since 2002; originally, the vision for this organization was to reduce the impact of HIV/AIDS, but through their work, they recognized the impact and relationship between HIV/AIDS and Gender Based Violence.

NATICC does Radio Programs in Eswatini addressing issues of SEA and GBV in Eswatini. This organization also does Education and Awareness-raising through community dialogues in the Shiselweni Region, offers Counselling Services to individuals, couples, and families from all over Shiselweni Region and in some special cases even outside the region, provides Court Support to Children who are survivors of abuse and are legally obligated to stand in for trial in a Court of Law, and offers Child Protection Services. Consequently, the organization has been engaged by EWSC to handle all SEA and GBV related cases of the project. All SEA and GBV related cases will be referred to NATICC with clear and active feedback on progress to EWSC.

1.2 SEA Process and Procedure

The process and procedure adopted for the project is guided by different policies both at country and organizational level. These policies are the umbrella under which all cases related to SEA shall be guided. Below is a highlight of the policies:

1.2.1 EWSC Policies

The Corporations **Code of Ethics policy** provides a set of principles that support a culture of strong corporate governance, sound business practices and ethical conduct which is critical to the Corporations defined integrity, professionalism, and a good behavior. Under **Section 3.15.2** the policy addresses Sexual Harassment. According to this section, the Sexual Harassment policy is mandated to regulate employee conduct and relations in the workplace and ensure sexual harassment does not occur. Listed as part of, but not limited to, sexual harassment is:

- ✓ Unwelcome sexual advances
- ✓ Verbal or physical conduct of sexual nature e.g. uninvited touching, sexually related comments
- ✓ Stalking
- ✓ Inappropriate expression and/or teasing with a sexual connotation

- ✓ The policy reads together with the Sexual Offences and Domestic Violence Act.

1.2.2 NATICC Policies

1. HUMAN RESOURCES MANAGEMENT POLICY
2. CODE OF CONDUCT POLICY
3. INFORMATION TECHNOLOGY POLICY AND PROCEDURE MANUAL
4. PROCUREMENT POLICY
5. ORGANISATIONAL VEHICLE POLICY
6. ANTI FRAUD AND CORRUPTION POLICY
7. GOVERNANCE AND MANAGEMENT POLICY
8. GENDER POLICY
9. FINANCE AND ACCOUNTING POLICY
10. DISCIPLINARY CODE AND PROCEDURES

Details on what each policy entails are as follows:

Human Resources Management Policy - This policy is designed as an easy guide to the Human resource management and administration within NATICC. The organisation shall attract, employ and retain high calibre employees, who will ensure attainment of organisational goal.

Code of Conduct Policy – this policy is to promote greater accountability and outline the key responsibilities of employees. It seeks to protect all employees. It seeks to protect all employees as well as every community member whom NATICC seeks to assist. All employees must be mindful that each action in the respective context can have repercussions for the fate of many.

Information Technology policy and Procedure Manual – this policy provides guidelines for the purchase of hardware for the organisation to ensure that all hardware technology for the organisation is appropriate, value for money and where applicable

integrates with other technology for the organisation. The objective of this policy is to ensure that there is minimum diversity of hardware within the organisation.

Procurement Policy - is to establish a sound regulatory framework for procurement of goods, materials, works and services by NATICC to reduce abuse and misuse of NATICC resources, infuse accountability and to enhance public confidence in the procurement process within NATICC and promote fair competition for the supply of goods and services to protect the interest of suppliers as well as consumers and customers in order to achieve transparency. The principal aim is to ensure that NATICC issues enquiries for the supply of goods and services only to suppliers which are technically and financially competent and able to fulfil the terms of any contract entered into and have the physical capability to execute the work within the time-span required by NATICC.

Organisational Vehicle Policy - this policy is to clearly define: the rules and regulations governing the use of the organisational vehicles by employees, organizational requirements to be met in this regard prior to being issued with an organisational vehicle, and an acknowledgment by the drivers of the responsibility being allocated to them when making use of organisational vehicles.

Anti-fraud and Corruption Policy - NATICC has zero tolerance for fraud and corruption, meaning that NATICC employees, non-staff personnel, vendors, implementing partners and responsible parties are not to engage in fraud or corruption. All incidents of fraud and corruption are to be reported, and shall be assessed and, as appropriate, investigated in accordance with the Code of Conduct of NATICC. NATICC shall pursue rigorously disciplinary and other actions against perpetrators of fraud, including recovery of financial loss suffered by NATICC. NATICC shall be committed to preventing, identifying and addressing all acts of fraud and corruption against NATICC, through raising awareness of fraud risks, implementing controls aimed at preventing and detecting fraud and corruption, and enforcing this Policy. This Policy applies to all activities and operations of NATICC, including projects and programs funded by partners and/or donors.

This Policy aims to prevent, detect and address acts of fraud and corruption involving:

- Employees holding a NATICC letter of appointment;
- Non-staff personnel, including Service Contract holders, Individual Contractors, Volunteers assigned to NATICC and interns;
- Vendors, including actual or potential contractors of civil works and suppliers of goods and services (collectively, “vendors”); and
- Implementing partners and responsible parties engaged/contracted by NATICC for a NATICC funded project (“implementing partners” and “responsible parties”, respectively).

Governance and Management Policy – this policy aims to provide good governance and strategic management in order to effectively achieve organizational vision. It explains in more detail:

- Terms of Reference of the Board
- Guidelines for Technical Board Selection
- The Role of the Board
- Conflict of interest
- Board meetings and decision-making
- Attendance at Board Meetings
- Orientation for new Board Members
- Board Performance Appraisals
- Committees of the Board
- The role of the Director
- Strategic Planning processes
- Operational Planning
- Board Motivation
- Review of Policies

Gender Policy – the goal and objectives of this policy are as follows. Firstly, the main goal is to achieve gender equality, equity and empowerment of women, men, boys and girls

in all aspects of life for attainment of sustainable development. The three (3) main objectives of this policy is to ensure that all NATICC programs and projects are gender sensitive from the design stage to implementation, monitoring and evaluation, to provide capacity building for NATICC employees on gender mainstreaming and gender analysis to ensure gender sensitive planning and budgeting and to provide direction for the development of effective programs for the prevention of GBV violence and sexual harassment.

Finance and Accounting Policy – the objective of this policy is set out of the financial operating procedures and regulations that will guide NATICC in its day-to-day financial operations. These operating procedures and regulations should be read and applied in the context of the relevant Eswatini accounting standards and by extension the international accounting standards and should conform to these standards where appropriate and applicable.

Disciplinary Code and Procedures - this policy identifies who has authority to take disciplinary action and aims to ensure that employees are protected against unjustifiable or inconsistent disciplinary action. It also identifies the type of offence which would result in disciplinary action being taken, what that action would be and what further action would result if there is no improvement or a recurrence takes place.

1.2.3 National Legislations

1.2.3.1 The Sexual Offences and Domestic Violence Act (SODVA) 2018

This act makes provision concerning sexual offences and domestic violence, prevention and the protection of all persons from harm, from other sexual acts and acts of domestic violence and to provide for matters incidental thereto.

1.2.3.2 Children's Protection and Welfare Act (CPWA) 2012

This act extends provisions on the standards and rules on the protection and welfare of children, the care protection and maintenance of children; and to provide for matters incidental thereto.

1.3 Project Risks Related To SEA

▪ HIV & AIDS Impacts

The migration of people from different regions may lead to behavioral influences which may increase the spread of diseases such as Human Immuno-Deficiency Virus (HIV), Acquired Immune Deficiency Syndrome (AIDS), and other Sexually Transmitted Infections (STIs).

Mitigation:

- Sensitize workers and the surrounding communities on awareness, prevention, and management of HIV/AIDS, including links with risks for sexual exploitation and abuse, through staff training, awareness campaigns, multimedia, and workshops or during community barazas.
- Provide information, education, and communication about safe uses of drinking water.
- Provide an on-site clinic to provide Voluntary Counselling and Testing (VCT) services to the construction crew.

▪ Gender Equity, Sexual Harassment

The construction of the septic tanks will be in schools and the risk of sexual exploitation and abuse and sexual harassment by workers on the school-going children is likely to be high. Construction workers are predominantly younger males. Those who are away from home on the construction job are typically separated from their family and act outside their normal sphere of social control. This can lead to risks for SEA for both women and girls in host communities for workers, including risks for transactional sex and sexual relations with minors.

EWSC, NATICC and the construction company shall have in place a code of conduct addressing SEA and GBV and outlining applicable sanctions as well as an anti-sexual harassment policy for the work environment, likewise, to be outlined in human resources handbook or policy materials.

Mitigation:

- | |
|--|
| <ul style="list-style-type: none"><input type="checkbox"/> Ensure all workers and project personnel sign the code of conduct.<input type="checkbox"/> Training on Gender-Based Violence (GBV), including SEA.<input type="checkbox"/> Prepare SEA Prevention and Response Action Plan. |
|--|

1.4 Proposed SEA Risk Mitigation Measures

Below is a summary of the proposed mitigation measures that the project will adopt to prevent and respond to both SEA and HIV/AIDS related issues.

- Mapping of GBV survivor support services (psychosocial, medical, and legal) in the project areas, including availability and quality of care;
- Developing and implementing a Grievance Redress Mechanism (GRM) that will ensure multiple safe and accessible entry points as well as confidentiality on reporting and resolution of SEA cases related to the project; GRM shall include service-mapping information as well as information-sharing and response protocols;
- Sensitize and train project workers and Project affected communities on SEA, the Code of Conduct (which is annexed to the LMP for EWSSAP), including prohibited behaviours and applicable sanctions, as well as entry points and reporting channels from the EWSSAP GRM prior to construction;
- Ensure all workers understand and sign code of conduct prior to start of civil works;
- Hold inclusive, participatory community consultations with women from Project affected communities, paying special attention to the needs of women with disabilities and women from other vulnerable/marginalized groups, in separate, safe, and confidential settings with female facilitators to allow for free expression of views and confidentiality during the focus group discussions on issues related to SEA, HIV/AIDS and other communicable diseases, as well as other sensitive topics;
- Include mandatory SEA risk mitigation clauses in bidding documents and contracts;

- Monitoring of indicators in relation to SEA risk mitigation measures;
- Sensitize workers and the Project affected communities on awareness, prevention, and management of HIV/AIDS, including links with SEA, through staff training, awareness campaigns, multimedia, and workshops or during community meetings prior to construction; and
- Provide an on-site clinic HIV testing and counselling services to all Project workers, including the construction crews, and communities on a quarterly basis.

1.5 Implementation of the SEA Action Plan

The SEA Action Plan will be implemented by Nhlanguano AIDS Training Information and Counselling Centre (NATICC) and monitored by EWSC. EWSC has entered into a formal agreement with NATICC to facilitate SEA and GBV-related trainings within the three targeted Tinkhundla before construction works commence. A Memorandum of Understanding (MoU) has been drawn and signed by NATICC and EWSC.

NATICC will implement the developed SEA Action Plan and take lead on the management of cases during project implementation and report to EWSC. All SEA-related cases will be referred to NATICC with a clear and active feedback on progress to EWSC. NATICC partners with different stakeholders to manage and address SEA in the country such as Hospitals, Police Stations, Psychologist and Social Workers. Informed consent shall be obtained from the survivor in order to report a case to the police (exceptions may be made in accordance with the law under mandatory reporting jurisdictions). EWSC shall ensure that survivors and communities are informed of these aspects in advance and during the community awareness raising sessions on health and safety to be conducted prior to the commencement of works. In addressing all SEA complaints, NATICC will follow the process outlined in the EWSSAP grievance redress procedure on the reporting and management of SEA complaints. The full GRM process to be followed is outlined in the Stakeholder Engagement Plan (SEP) for the project.

1.6 SEA Grievance Procedure

The process/procedure is highlighted below:

- A SEA Logbook will be used to record all cases received related to SEA which will be kept and monitored by NATICC. This Logbook will record the case numbers,

who received the case, who made the referral, and the person who received it from NATICC including a status column that will show pending or closed cases.

- Due to the sensitivity of SEA cases and HIV/AIDS related issues, these grievances will be managed separately from other types of grievances and will not be documented in the publicly accessible book provided by the project GRM. NATICC will be the only entity with access to survivor identities. All information transmitted to the project GBV Logbook will be anonymous (survivor names replaced with unique identifier codes).
- All SEA complaints received by the project through any of the intake channels of the EWSSAP GRM shall be referred to NATICC, which has offices in Nhlngano (near project area) via the national referral tool by NATICC.
- Upon receiving cases (via telephone or walk-ins), NATICC will provide immediate referrals to service providers upon case intake for walk-ins. For cases received via telephone, NATICC shall make contact with the survivor within 48 hours of cases being submitted. However, in cases of sexual assault, NATICC will make the initial contact immediately (within 24 hours) because the survivor will need medical attention for HIV prevention and emergency contraception.
- EWSC shall then await feedback from NATICC on the proceeding of the case (in some cases it will not be the full details of the case as some are kept highly confidential) and EWSC will also follow the GRM steps that have been put in place for SEA cases in the Project Grievance Redress Procedure.
- The verification reports provided by NATICC will clearly state findings of the case without exposing the survivor and recommendations made to the contractor for sanctions as stated in the Sexual Offences and Domestic Violence, (SODV) Act, 2018.
- The Logbook shall make it easier to track all cases. EWSC shall report the following information to the World Bank within 24 hours of receiving notification of a SEA complaint: case number if needed, age/sex of the survivor, type of SEA, project link (if known), whether the survivor was referred for services, as well as any status updates on pending cases as needed.

1.7 SEA Reporting Channels

The reporting channels for SEA complaints are varied to allow for anonymous reporting as well as reporting through channels that are accessible, safe, and confidential to survivors. The following will be used to report all SEA cases involving the Project:

- In-person reporting – Anyone making a complaint related to SEA may file a report in person to the Regional Engineer, to a Community Liaison Officer (CLO) at the community level, or at the NATICC offices in Nhlanguano, which can be accessed on all weekdays. A GBV case worker shall be on stand-by to attend to SEA cases reported on weekends. The NATICC will be the focal point for all SEA related cases in the project.
- Toll free line – NATICC has a WhatsApp: +268 79653610 operating from 08:00am - 5:00pm during the week, for reporting any form of abuse or assault anonymously. This line is monitored by the case management workers at NATICC who have been trained on SEA complaint intake and service referral protocols.
- National case intake and management tool – NATICC uses national case intake and management tools to receive, refer, and resolve SEA incidents. These include the following steps: intake and risk assessment, social assessment and care planning, referral of cases to the Department of Social Welfare, family/stakeholders case conferencing, follow-up and case review and case closure. NATICC will follow these steps when managing all SEA incidents under the project.
- In accordance to section 70 of SODV, Act, 2018, a person who witnesses or receives information about a sexual offence or has reasonable grounds to believe an offence has taken place, has a duty to report the offence to the police. In addition, any person who coerces, forces or persuades a victim of a sexual offence not to report the offence or to withdraw a complaint, is guilty of a criminal offence. The Social Development Officer in collaboration with NATICC, shall inform all participants of this obligation, during regular community awareness raising sessions on health and safety, which will be held on a regular basis during Project implementation. Furthermore, NATICC will inform all survivors of this clause before moving forward with a formal complaint.

- It is worth noting that in the steps discussed above, some cases will not be necessary to follow step for step. For instance, some survivors may choose to directly call the country's toll-free line (951) which is directed to Eswatini Action Group Against Abuse (SWAGAA) and monitored by case management workers at SWAGAA. For anonymity purposes to which then EWSC may not be aware of the case at first instance; hence NATICC has agreed to also keep the same Logbook that the project will use so they record all cases there for tracking against the project Logbook, so no case goes untraced or unknown by EWSC. A monthly review of both Logbooks shall be done in order to be able to report on all cases regardless of the channel used to report them. This is due to the sensitivity of complaints related to SEA. The case management workers use the national case intake and reporting tools to refer cases to NATICC for follow-up and monitoring until case closure.

Table 1: SEA/S and GBV Action Plan

Action	Timing of Action	Key Activities	Responsibility	Indicators
Planning Stage				
Sensitize the EWSC PIU on the importance of addressing SEA risks in the project and identify the mechanism that will be implemented	Preparation and Implementation	EWSC will mobilize workers for the dialogues and NATICC to facilitate the dialogues.	NATICC	-Percentage of PIU personnel sensitized and trained on SEA risks.
Map out GBV prevention and response actors in the project area. GBV service providers to provide quality survivor - centered services for medical, psychosocial, and legal assistance, including case management, survivor advocates, provide referral pathway for all needed service referrals (in accordance with international best practices)	Preparation and Implementation (April 2022)	Identify all GBV service providers in the project area and the services that they provide.	PIU	-Number of GBV service providers in the project area and services they provide
SEA risks adequately reflected in all E & S project documentation (Project ESMP, ESMF, LMP, ESCP & SEP)	Preparation and Implementation (ongoing)	Identify all GBV risk and mitigation measures in all E&S project	PIU	-Number of E & S project documents with SEA risks

Action	Timing of Action	Key Activities	Responsibility	Indicators
		documents including penalties for nonconformance		adequately reflected
As part of Stakeholder consultations, solicit information from communities on the SEA risks and safe and accessible entry points to GRM and discuss proposed mitigation measures, including service availability; stakeholder consultations must include independent discussions with women in safe and confidential spaces with female facilitators.	Preparation and Implementation (June 2022 - ongoing)	Solicit information from communities, especially women, on SEA risk, proposed GRM entry points, and availability of services - Conduct community awareness raising sessions on SEA and how to report any cases Note that consultations or sensitization sessions should not take place until basic service mapping information is available	NATICC and PIU	-Number of community consultation meetings conducted -Number of Community awareness raising sessions conducted -Number of community members reached with SEA sessions (segregated by sex)
Develop an effective Grievance Mechanism (GM) with multiple safe and confidential channels to initiate complaints including safe and confidential referral and management	Preparation and Implementation (June 2022 – ongoing)	Develop, sensitize and ensure accessibility of an effective GM in the project area -Implement project grievance redress procedure when handling SEA cases.	NATICC, PIU and the Contractor	-% of SEA complaints referred to services through GM procedures

Action	Timing of Action	Key Activities	Responsibility	Indicators
of SEA complaints; GM must include service-mapping information and response and information-sharing protocols.				-% of SEA complaints resolved in prescribed GM timeframe -Average delay in resolving SEA complaints
Avail Funding for EEC to ensure NATICC facilitates access to timely, safe and confidential services to survivors for medical, psychosocial, and legal assistance (including use of short-term shelter or safe spaces) where required	Preparation and Implementation	Funds to cater for transportation for access to holistic services, documentation of legal fees and lodging fees (place of safety) if necessary	PIU	-% of SEA cases that required legal representation -% of SEA survivors transferred to places of short-term shelter
Procurement Stage				
Clearly define the SEA requirements and expectations in the bid documents	Procurement	Include sections/clauses in the bidding documents that state how contractors will address SEA risks in the project	PIU	-Number of bidding documents with

Action	Timing of Action	Key Activities	Responsibility	Indicators
				clearly defined SEA requirements.
Clearly explain and define the requirements of the bidders Code of Conduct before submission of bids	Procurement	Facilitate Pre-bidding conference meetings to discuss the project E&S requirements on Addressing SEA risks	PIU	-Number of bidding documents with clearly defined SEA requirements
Evaluate the contractors' SEA Accountability and Response Framework (SEA Policy) in the Contractors ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's SEA prevention and response requirements	Procurement	Facilitate evaluation of contractors	PIU	-Number of bid documents evaluated on SEA risks and mitigation measures (Availability of policies and procedures)
Implementation				
Review contractors ESMP to verify that appropriate mitigation actions are included, including sex-segregated, secure, and well-lit accommodation and sanitation facilities for workers as well	Implementation	Ensure that all contractors ESMP are reviewed	PIU	-Number of ESMPs reviewed

Action	Timing of Action	Key Activities	Responsibility	Indicators
as signage around work sites explaining that SEA is prohibited (see below)				
Review the Grievance Mechanism's reception and processing of complaints to ensure that all protocols are being followed in a timely and effective manner	Implementation	Ensure that contractor employees and NATICC are aware of the grievance procedure and ensure that complaints submitted are resolved and recorded	PIU	<p>-% of SEA cases received through the GM which are referred to services</p> <p>-% of SEA complaints resolved within the prescribed GM timeframe</p> <p>-Average time taken to resolve SEA grievances within the stipulated timelines in the GM</p>
Ensure Code of Conduct is understood and signed by all project workers and	Initiated prior to contractor mobilization	Ensure requirements of the CoC are clearly understood by those signing.	PIU	-% of project workers and PIU

Action	Timing of Action	Key Activities	Responsibility	Indicators
<p>PIU personnel; Code of Conduct must specifically address and prohibit SEA and outline applicable sanctions and where to report infractions.</p>	<p>and continued during project implementation</p>	<p>Train project workers and PIU personnel on the behaviour obligations under the CoC</p> <p>Disseminate CoCs (including visual illustrations) and discuss with workers and PIU personnel 4. Have all project workers, PIU personnel, and communities in the project area undergo training and/or sensitization on SEA. Undertake monthly monitoring and evaluations of progress on SEA prevention and response activities, including re-assessments of risks as appropriate.</p>	<p>Supervising Consultancy Contractor NATICC</p>	<p>personnel trained on Code of Conduct</p> <p>-Percentage of project workers and PIU personnel who signed Code of Conduct</p> <p>-Number of sites with visually displayed code of conducts</p> <p>-Number of toolbox talks conducted on SEA risks in the project.</p>
<p>Organize community awareness-raising sessions to disseminate information</p>	<p>Throughout Implementation</p>	<p>Ensure that community members in project affected areas are aware of</p>	<p>NATICC</p>	<p>-Number of community</p>

Action	Timing of Action	Key Activities	Responsibility	Indicators
about prohibited SEA conduct, how to report SEA incidents through the GM, and availability of services		SEA, how to access the GRM, and where to seek assistance in cases of SEA incidents. Note that sensitizations should not take place until basic servicemapping information is available and SEA complaint channel is operational.	PIU CLOs	sensitization sessions conducted -Number of community members reached with SEA sensitization (segregated by sex)
Provide onsite HIV voluntary counselling and testing	Throughout Implementation	EWSC to mobilize workers for the testing EWSC to mobilize venue where onsite counselling and testing will be conducted. FLAS and NATICC will conduct the counselling and testing.	EWSC Contractor	-Number of workers who know their HIV status

Action	Timing of Action	Key Activities	Responsibility	Indicators
		NATICC and FLAS will provide periodic reports on activity progress.		
Implement appropriate project-level activities to reduce SEA risks	Prior to commencement of works (May 2022 - Ongoing)	<p>Have separate, safe and easily accessible facilities for women and men working on the site, located in separate areas, well-lit and should include the ability to be locked from the inside.</p> <p>Visibly display signs around the project site that signals the workers and communities that the site is an area where SEA is prohibited.</p>	<p>PIU</p> <p>Supervising Consultancy</p> <p>Contractor</p> <p>NATICC</p>	<p>-Number of construction sites with sex-segregated, safe, and easily accessible facilities for women and men</p> <p>-Number of construction sites with visibly displayed signs</p>
Provide psycho-social support for GBV and SEA survivors	Throughout Implementation	<p>EWSC and NATICC to formulate a workable referral pathway.</p> <p>EWSC, NATICC and other stakeholders to identify GBV and SEA survivors in the communities.</p>	NATICC and EWSC	-Number of clients receiving post-abuse care.

Action	Timing of Action	Key Activities	Responsibility	Indicators
		<p>NATICC to provide comprehensive case management for all survivors.</p> <p>NATICC to provide periodic progress reports on progress.</p>		