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**MINISTRY OF PUBLIC WORKS, HOUSING AND WATER RESOURCES,  
NATIONAL ROADS ADMINISTRATION, PUBLIC INSTITUTE**

**CLIMATE RESILIENT ROADS FOR THE NORTH (P500488)**

**In the Provinces of Cabo Delgado, Nampula & Niassa – Mozambique**

# **GBV/SEA/SH RISK ASSESSEMENT AND RESPONSE ACTION PLAN**

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**PREPARED FOR**



Administração Nacional de Estradas (ANE)

Gabinete do Director Geral

Attention: Mr. Elias Anlaué Paulo - Director General

Av. de Moçambique, Nº 1225, C.P. 403

Maputo Mozambique

Telephone: +258 21 476 163 / 7,

Email: [anenorte.42@ane.gov.mz](mailto:anenorte.42@ane.gov.mz)

**PREPARED BY**



[info@jbn.co.ug](mailto:info@jbn.co.ug) / [www.jbn.co.ug](http://www.jbn.co.ug)

Kampala, Uganda

*in Joint Venture with*



**EA Consultoria**

[info@ea.intelligentperspectives.com](mailto:info@ea.intelligentperspectives.com)

Maputo, Mozambique

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## ABREVIATIONS

CoC	Code of Conduct
CSO	Civil Society Organization
FGD	Focus Group Discussion
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
ANE	National Roads Administration
GPN	Good Practice Note
NGO	Non-Governmental Organization
SEA/SH	Sexual Exploitation, Abuse, and Sexual Harassment
STI	Sexually Transmitted Infection
UN	United Nations
VAW	Violence Against Women
WHO	World Health Organization
GBV	Gender Based Violence
SA	Sexual Abuse

## GLOSSARY

**Sexual Assault**<sup>1</sup>: Activity with another person who does not consent. It is a violation of bodily integrity and sexual autonomy and is broader than narrower conceptions of “rape,” especially because (a) it may be committed by other means than force or violence, and (b) it does not necessarily entail penetration (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).

**Sexual exploitation**: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 6).

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

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<sup>1</sup> World Bank. 2019. ESF Good Practice Note (GPN) on Non Discrimination: Sexual Orientation and Gender Identity.

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

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

**Child** : The United Nations Convention on the Rights of the Child defines a child as a human being younger than 18 years, unless under the law applicable to the child the age of majority is reached earlier.

**Child protection** : A broad term to describe efforts aimed at keeping children safe from harm. The United Nations Children’s Fund (UNICEF) uses the term “child protection” to refer to preventing and responding to violence, exploitation, neglect, and abuse against children.

**Child safeguarding** : Refers to measures taken to promote the welfare of children and protect them from harm. In the context of the Development Response to Displacement Impacts Project (DRIDP), the broad obligation of staff and partners is to ensure DRDIP activities and project operations do not expose children to adverse impacts, including the risk of abuse and exploitation, and that any concerns about children’s safety within the communities where they work are appropriately reported.

**Displacement:** Forcible or voluntary uprooting of persons from their homes by violent conflicts, gross violations of human rights and other traumatic events, or threats thereof. Persons who remain within the borders of their own country are known as internally displaced persons.

**Host communities:** Communities that host large populations of refugees and/or internally displaced persons, typically in camps, local settlements or integrated into households. Mainstreaming child protection. Mainstreaming child protection means assessing specific child protection needs and risks associated with a project or intervention and undertaking appropriate measures to mitigate or address the identified risks.

**Violence against children (VAC)** : Violence against children refers to any deliberate, unwanted and non-essential act, threatened or actual, against a child or against multiple children that results in or has a high likelihood of resulting in death, injury or other forms of physical and psychological suffering. An act refers to the process of doing or performing something. This includes acts of omission, which refer to the failure to perform an act.

**Child marriage**<sup>2</sup> : “any marriage where at least one of the parties is under 18 years of age. A child marriage is considered to be a form of forced marriage, given that one and/or both parties have not expressed full, free and informed consent.”

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<sup>2</sup> United Nations Committee on the Elimination of Discrimination against Women and the United Nations Committee on the Rights of the Child

## 1. INTRODUCTION

### 1.1 Background of the Project

This document is designed to comprehensively assess the risks associated with Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) relevant to the project context, including activities related to the Climate Resilient Roads for the North Project (CRRNP) in Mozambique. The primary aim is to identify potential GBV/SEA/SH risks and develop a strategic action plan for their mitigation and response. This assessment and action plan are an integral to ensuring the safety, dignity, and rights of all individuals affected by the project, particularly in vulnerable communities.

The GBV/SEA/SH Risk Assessment and Action Plan is an annex to the Environmental and Social Management Framework (ESMF). It complements the ESMF by specifically addressing the social risks of GBV, SEA, SH and VAC associated with the project activities. This document is a critical part of the ESMF, providing a focused and detailed approach to identifying, mitigating, and managing GBV/SEA/SH risks in alignment with the broader environmental and social safeguards outlined in the ESMF.

This document adheres to the guidelines set forth by the World Bank, particularly those detailed in the 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 (3rd edition, October 2022)<sup>3</sup>. These guidelines emphasize the importance of identifying and mitigating GBV/SEA/SH risks, ensuring the protection and empowerment of affected communities, and incorporating these measures into the project's overall risk management strategy. The World Bank's guidelines serve as a foundational framework, guiding the development of this action plan to align with international best practices and the specific requirements of the Bank for project financing.

## 2. OBJECTIVES

The objectives of the Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) and VAC (Violence Against Children) risk assessment and response action plan within the context of the implementation of the Climate Resilient Roads for the North (P500488) are:

1. Identify risks that can be initiated or exacerbated by project operations;
2. Develop a response action plan to prevent, respond, and mitigate instances of GBV, SEA, SH and VAC within the project, adhering to the World Bank's zero-tolerance policy.

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<sup>3</sup> <https://pubdocs.worldbank.org/en/632511583165318586/ESF-GPN-SEASH-in-major-civil-works.pdf>

3. Ensure the protection of vulnerable populations, aligning with World Bank safeguarding principles.
4. Propose a robust and transparent mechanism for reporting, investigating, and addressing incidents/complaints of GBV, SEA, SH and VAC adhering to the World Bank's accountability framework and local legal framework.

### 3. TARGET AUDIENCE

The GBV/SEA/SH risk assessment and response action plan will include all stakeholders involved in the project and its implementation, namely :

1. PIU (Project Implementation Unity) and organizations responsible for executing the project, such as government agencies or non-governmental organizations (NGOs). Since the main GBV/SEA/SH risk mitigation interventions will be implemented during all phases of project implementation.
2. Project Managers, contractors personnel & and coordinators, and field staff who are directly involved in project activities.
3. The communities residing in or around the project area may be directly affected by the project's activities.
4. Project Beneficiaries include vulnerable populations (women, adolescent girls, young women, children, people with disabilities, and internally displaced people)
5. Organizations and groups focused on women's rights and gender equality in projects area including grassroots organizations led by women
6. Experts in the field of gender-based violence who can provide guidance and technical support to the project including social experts and GBV focal points;
7. UN agencies and CSOs working on issues related to GBV and human rights in humanitarian settings.
8. Government Agencies and departments or ministries responsible for social welfare, health, and justice.

### 4. METHODOLOGY

This GBV risk assessment exercise was initiated by conducting a comprehensive desk review of the socio-economic, cultural, and political context of the project site and its surroundings. This includes an investigation of the gender dynamics prevalent in the region, including gender disparities, power dynamics, and social norms according to the approved social consultation plan.

A brief gender and GBV risk analysis to identify gender disparities, vulnerabilities, and power dynamics within the project area. A comprehensive consultation process was conducted with relevant stakeholders including community members from project-affected communities. Based on the provided information, GBV and associated risks were

identified and assessed considering their potential impact on individuals and communities.

A risk matrix that categorizes the identified risks as low, moderate, or high, taking into account both their severity and likelihood. This matrix will help prioritize mitigation efforts and prioritization. Based on the findings, were proposed targeted mitigation measures to prevent and address identified GBV and associated risks. These measures should be tailored to the specific risks and may include modifications to project design, community engagement strategies, and GBV awareness campaigns.

## 5. PROJECT CONTEXT AND BACKGROUND

The Climate Resilient Roads For The North project, initiated on November 1, 2023, in Northern Mozambique with World Bank funding, aims to enhance road connectivity in Cabo Delgado, Niassa, and Nampula provinces. Sub-component 1.1 will focus on the improvement and maintenance of a road network, land acquisition, and resettlement for affected persons. The Sub-component 1.2 aims at improving bridges and drainage structures. Component 3: Institutional Strengthening and Project Management will include the development of women-led community resilience committees for emergency response, promotion of women's employment, and skills development in roadworks.

This project comprehensively addresses road improvement, safety, and institutional strengthening in Mozambique, with a special emphasis on climate resilience, community involvement, and gender inclusivity.

With a total budget of approximately US\$ 125 million, the project focuses on upgrading, rehabilitating, and maintaining selected secondary and tertiary roads and bridges. Key components include the improvement of road segments totaling about 92 km, construction and rehabilitation of five concrete bridges, and installation of bailey/metallic bridges. The project also integrates a Safe System approach for road safety, encompassing regulation, inspection, engineering, education, and traffic calming measures. Additionally, community infrastructure such as markets, schools, and health centers will be developed along these roads. Institutional strengthening, project management, and a contingent emergency response mechanism form integral parts of the project<sup>4</sup>. According to project documents, risks related to displacement, SEA, SH and VAC are associated labor influx, and community health and safety, discrimination and equal opportunity for labor may arise during project implementation, lack of participation of vulnerable groups in decision-making processes can be initiated or exacerbated by project operations. This conflict situation and associated security risks, along with the presence of security personnel, further complicate the interaction between internally displaced persons (IDPs), host communities, and contractor workers in rural and isolated areas.

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<sup>4</sup><https://documents1.worldbank.org/curated/en/099110123123518567/pdf/P50048801da142076092e80d3ed54e1e257.pdf>

## 6. STATUS OF GBV/SEA/SH IN PROJECT LOCATIONS

The project is concentrated in the province of Cabo Delgado and involves the northern provinces of Niassa and Nampula. It focuses on road construction and the installation of bridges, primarily in rural areas. Mozambique, particularly the provinces of Cabo Delgado, Niassa, and Nampula, has experienced various challenges, including political tensions and armed conflicts<sup>5</sup>. Poverty and lack of economic opportunities can contribute to GBV/SEA. Economic dependency can force individuals into exploitative situations, including transactional sex. Traditional gender roles and norms can influence the prevalence and perception of GBV/SEA. Since the first attack in Cabo Delgado in October 2017, there has been an increase in killings, beheadings, kidnappings, and sexual abuse of women and girls. Over 714,000 civilians have been displaced, with 46% being children. Families fleeing violence in Cabo Delgado have been forced to abandon their livelihoods and resources, leading to significant humanitarian challenges<sup>6</sup>. According to the latest data, 37% of Mozambican women aged 15 to 49 experience violence in their lifetime, and half of the girls marry before 18<sup>7</sup>. Cabo Delgado has experienced a worrying rise in child marriage, partly due to the distress of families living in transit centers or starting new lives in challenging conditions. Many parents are forced to marry off their children due to economic hardships.

The ongoing conflict has exacerbated the situation, affecting around 370,000 children and leading to reports of human and child rights violations<sup>8</sup>. Cabo Delgado has the second-highest rate of child marriage in Mozambique, with 65% of adolescents aged 15-19 already mothers or pregnant<sup>9</sup>. According to a recent report. From Save the Children<sup>10</sup>, the worrying rise in child marriage is the result of a combination of factors, including the continued distress many of the families have been facing while living in transit centers or the challenges of starting new life from scratch in new areas. Many parents face the devastating choice of being unable to feed their family or house all their children, and instead have to let them be married to lighten the load on the family. Regions experiencing conflicts, such as Cabo Delgado, face increased risks.

Conflict can disrupt social networks and lead to situations where individuals are more vulnerable to exploitation and abuse. The road descriptions suggest significant transportation routes. Areas along major roads can sometimes have increased risks of

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<sup>5</sup> <https://mozambique.unfpa.org/en/publications/gbv-aor-bi-annual-report-2022>

<sup>6</sup> <https://plan-international.org/mozambique/publications/rapid-gender-analysis-on-the-conflict-in-cabo-delgado/>

<sup>7</sup> <https://bmcpublichealth.biomedcentral.com/articles/10.1186/s12889-021-10820-x>

<sup>8</sup> <https://esaro.unfpa.org/en/news/meeting-urgent-needs-vulnerable-women-and-girls-and-those-displaced-violence-cabo-delgado-%E2%80%93>

<sup>9</sup> <https://reliefweb.int/report/mozambique/rates-child-marriage-double-amongst-thousands-children-displaced-conflict-cabo-delgado>

<sup>10</sup> <https://www.misau.gov.mz/index.php/relatorios-programaticos?download=1833:relatorio-semesteral-de-actividades-na-area-da-violencia-baseada-no-genero-vbg-2022>

GBV/SEA/SH/VAC due to factors like human trafficking and the movement of vulnerable populations.

## **6.1 Gender profile**

In Mozambique's provinces of Nampula, Niassa, and Cabo Delgado, the gender-social context is increasingly being influenced not only by cultural, economic, and political factors but also by the growing impacts of climate change and displacement. These predominantly rural areas, marked by significant gender inequalities, face unique challenges as a result of these environmental factors.

The primary economic involvement of women in these regions is in the informal and agricultural sectors. With climate change causing unpredictable weather patterns, subsistence farming, where most women are engaged, becomes increasingly vulnerable. This vulnerability exacerbates food insecurity and loss of livelihood, disproportionately affecting women who lack access to formal employment opportunities.

Educational disparities are further intensified by climate-induced displacement. UNESCO reports that the female literacy rate in these provinces is below 40% in some areas. Displacement due to environmental factors often leads to increased school dropout rates for children and more so the girls, who face additional barriers like, child pregnancy, early marriage and cultural biases.

Health challenges, including some of the country's highest maternal mortality rates, are compounded by climate change. This leads to heightened risks of maternal deaths and HIV/AIDS infections among women. Traditional gender roles that predominantly view women as homemakers limit their public and economic engagement. These roles are further entrenched as displacement and environmental stresses place additional domestic burdens on women. Women's already low political representation (less than 30% in local governance bodies) faces further challenges in the context of climate change and displacement. The ensuing instability and resource scarcity can marginalize women's voices even more in leadership and decision-making roles.

The gender-social context in Nampula, Niassa, and Cabo Delgado is significantly impacted by the triad challenges of climate change, displacement, and conflict. Addressing these issues requires a multi-faceted and context-specific approach that recognizes the unique vulnerabilities of women.

## **6.2 GBV Legal framework**

Mozambique's comprehensive legal and policy framework for Gender-Based Violence (GBV) is a testament to the country's commitment to addressing this critical issue. This framework encompasses several key elements such as<sup>11</sup> :

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<sup>11</sup> <https://endgbv.africa/mapping/mozambique/>

1. Constitution of the Republic of Mozambique: This foundational legal document enshrines principles of gender equality and non-discrimination, emphasizing equality and human rights for all, regardless of gender.
2. Penal Code (Amendment): These amendments mark significant strides in addressing GBV, including the promotion of gender neutrality in laws, an expanded definition of rape, contextual considerations in sexual violence cases, and the decriminalization of consensual same-sex relations and considerations around unsafe abortions.
3. Domestic Violence Law: This law specifically tackles domestic violence, acknowledging the complexities of intra-family sexual assault and the role of community-led resolutions in addressing abuse cases.
4. Child Rights Promotion and Protection Law: Aligning with both the Constitution and international standards, this law focuses on protecting children from all forms of violence, including GBV, and ensuring justice for child survivors.
5. Mecanismo Integrado de Atendimento as Vitimas de Violencia: a comprehensive, multi-sectorial initiative designed to provide coordinated services to women victims of violence. This mechanism focuses on improving and expanding integrated services, including medical, police, legal, and social assistance. It aims to build capacities within government institutions and enhance collaboration with civil society for effective response to violence against women.
6. Gender Policy and Implementation Strategy, and the National Action Plan to Respond to GBV in the Health Sector (2019-2022) that is under review, demonstrate Mozambique's holistic approach to combating GBV, integrating gender equality principles into broader poverty reduction strategies and recognizing GBV as a medical emergency within the healthcare system.

Since the project will be implemented in conflict areas can be particularly challenging due to the complex and often volatile nature of such insecure environments. While specific laws targeting GBV in conflict zones may not be explicitly outlined in the general legal and policy framework, several aspects of the existing framework can be relevant and applicable:

7. Application of International Humanitarian Law: Mozambique, as a member of the international community, is subject to international humanitarian law, which includes provisions for the protection of civilians, including women and children, in conflict zones. These laws prohibit sexual violence and other forms of GBV in conflict situations.
8. Child Rights Promotion and Protection Law: This law is particularly significant in conflict zones where children are at increased risk of GBV and overall child rights abuse. It mandates the protection of children from all forms of violence and abuse, with a likely heightened emphasis in conflict areas.
9. Mozambique is a signatory to various international conventions and protocols, such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and the Convention on the Rights of the Child, which obligate the government to protect women and children from abuse of their rights inclusive of GBV in all circumstances, including armed conflict.

10. Collaboration with International Organizations including UN Agencies: In conflict areas, the Mozambican government often collaborates with international organizations (like the UN, WHO, and various NGOs) that specialize in providing aid and protection in such settings, including addressing GBV. These organizations are organized in clusters where project GBV interventions can be collaboratively implemented.

It's important to note that the effectiveness of these laws and policies in conflict areas depends heavily on the stability of governance structures, the capacity of law enforcement agencies, and the overall security situation. In many cases, ongoing conflict and instability can severely hinder the implementation and enforcement of these laws, making collaborations with international bodies and NGOs crucial for providing support and protection to GBV survivors in these regions.

### **6.3 GBV Service delivery in project areas**

According to the most recent data on GBV Cases Overview from the Ministry of Health (MOH)<sup>12</sup>, Nampula reported a considerable number of GBV cases, reflecting its larger population and potentially more effective awareness and reporting mechanisms. In Niassa, challenges typical of rural areas might lead to underreporting of GBV cases. Amidst conflict and displacement, Cabo Delgado has seen an increase in GBV cases, making the service delivery more complex as per the humanitarian context.

Progress in expanding GBV services and improving data reporting is evident across all three provinces. However, factors such as logistics, infrastructure, and security challenges might impact data accuracy. Socio-economic factors, cultural norms, and limited access to education and healthcare are key risk factors in Nampula and Niassa. In Cabo Delgado, conflict and displacement significantly elevate GBV risks, with the breakdown of social structures and security concerns adding complexity.

From this review, the main challenges in GBV service delivery are related to access to formal justice for GBV victims remains challenging across all provinces. Service delivery in Niassa and Nampula is hindered by rural settings and logistical issues, while in Cabo Delgado, the conflict impacts the implementation of GBV services. Cultural barriers, including traditional gender roles and stigma associated with GBV reporting, persist.

GBV/SEA/SH/VAC risks and impacts in CRRNP can be mitigated through the following avenues:

- Addressing cultural norms and improve GBV awareness through community engagement.
- Focusing on rural and conflict-affected areas for GBV service expansion.
- Improving mechanisms for data collection and reporting, considering each province's unique challenges.

- Developing region-specific strategies addressing the socio-economic and cultural factors influencing GBV.

These findings underscore the need for a coordinated and multifaceted approach to mitigate GBV risks in Nampula, Niassa, and Cabo Delgado. Tailored strategies, considering each province's unique context, are essential for effective GBV prevention and response.

## 6.4 Mapping and rating of GBV services and referral pathways

In the provinces of Nampula, Niassa, and Cabo Delgado, the service delivery landscape, especially concerning GBV services, is a complex network of formal, mobile, and informal providers. The coordination and integration of these services is crucial for addressing the multifaceted needs of communities. The georeferenced mapping of GBV services provides valuable insights into service distribution, identifies gaps, and helps in understanding the referral pathways for GBV incidents. Using the QA (Availability, Accessibility, Acceptability, and Quality) <sup>13</sup>framework helps assess and evaluate the effectiveness and inclusivity of various services.

### 6.4.1 Province-Specific Insights and Recommendations

**Nampula Province:** Services are relatively widespread, with a strong presence of health facilities, courts, police stations, and social services. This province benefits from a robust infrastructure of formal services, yet it's the integration with mobile and informal services that ensures a wider reach. However, challenges persist, especially in terms of physical and financial accessibility. While many services are in proximity to the communities, the actual access is hindered by transportation issues and indirect costs associated with service utilization. Moreover, there is a noted need for cultural competency training among service providers to improve social and information accessibility, ensuring that services are not only physically reachable but also socio-culturally accessible and acceptable.

**Niassa Province:** Known for its vast and sparsely populated areas, faces unique challenges. Here, the physical accessibility of services is a significant barrier, with many communities located far from formal service centers. Mobile services play a critical role in bridging this gap, but their scope and frequency need enhancement. Financial accessibility is less of an issue here, given the prevalence of free services. However, bureaucratic and administrative barriers often deter the utilization of available services. The quality of services is another area of concern, with a need for regular training of service providers and ensuring the availability of basic equipment and supplies.

**Cabo Delgado Province:** Stands out due to its ongoing conflict and humanitarian crisis, which adds layers of complexity to service delivery. The province hosts a mix of formal and informal services, with a notable presence of community leaders and activists who

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<sup>13</sup> <https://gbvguidelines.org/wp/wp-content/uploads/2019/11/AAAQ-framework-Nov-2019-WEB.pdf>

play a crucial role, especially in GBV service delivery. The physical accessibility of services is severely impacted by the security situation, making mobile and informal services not just complementary but often the primary source of support. Financial accessibility is less of an issue, thanks to numerous humanitarian efforts providing free services. However, the acceptability and quality of services are major concerns, with a need for services that are culturally sensitive and capable of operating in a conflict-sensitive manner.

**Across all three provinces**, there is a noticeable data gap in community engagement and feedback, particularly from women and girls. This gap underscores the need for tailored services that address specific barriers and needs. Regular consultations, focus groups, and surveys are recommended to ensure that services are not only physically available but also align with the cultural, social, and individual needs of the communities they aim to serve. In conclusion, a coordinated approach, integrating formal, mobile, and informal services, and focusing on community involvement and feedback, is essential.

This approach should be sensitive to the unique challenges of each province, with particular attention to the impact of conflict in regions like Cabo Delgado. Addressing these challenges will be a critical step toward improving the effectiveness of services and ensuring the safety and well-being of the most vulnerable populations, particularly women and girls, in these provinces.

## **Cross-Cutting Themes and General Recommendations**

**Community Engagement:** There's a noticeable data gap in community engagement, particularly from women and girls. Regular consultations, focus groups, and surveys are recommended to tailor services to specific barriers and needs.

**Coordinated Approach:** A coordinated approach integrating formal, mobile, and informal services is essential. This approach should focus on community involvement and feedback, being sensitive to the unique challenges of each province.

**Multi-Faceted Response:** A scaled-up response involving local governments, UN agencies, international organizations, and community stakeholders is imperative. This response should aim to provide inclusive, survivor-centered GBV services, enhancing capacity, safety, accessibility, and quality of services in a cultural sensitive/acceptable manner.

### **6.4.2 Findings from stakeholders' consultation**

The consultant conducted stakeholder consultation in project areas. The main findings from the transcription of discussions regarding Gender-Based Violence (GBV) in Cabo Delgado, Nampula, and Niassa were:

Table 1- Findings from stakeholders consultation

Key finding	Comments
<b>Increased GBV in Crisis Situations</b>	The transcription highlights a rise in GBV, especially in crisis situations like attacks and in displacement camps. Economic hardships, such as food scarcity, have led to exploitative practices like sex in exchange for food perpetrated by agents of humanitarian aid and security armed forces, public and private.
<b>Prevalence of Different Forms of GBV</b>	Various forms of GBV are noted, mainly sexual violence and rape. Physical, and psychological violence were also reported. Sexual exploitation is particularly highlighted in the context of economic power dynamics.
<b>Vulnerability of Specific Groups</b>	Women, children, and displaced persons are identified as particularly vulnerable to GBV. Economic dependency and societal norms exacerbate their vulnerability, increasing the risk of child marriage, sexual exploitation, and trafficking. That may result in increased incidence of HIV, STI's and teen pregnancy.
<b>Challenges in Reporting and Addressing GBV</b>	A significant issue is the underreporting of GBV cases, particularly when the perpetrator is a family member. Additionally, there's a lack of follow-through in the judicial process, leading to frustration and distrust among victims
<b>Multi-Sectorial Approach is a successful strategy</b>	Multi-sectorial system involving justice, police, and social action departments to address GBV. This approach signifies the recognition of GBV as a complex issue requiring collaborative efforts
<b>Community Awareness and Education are key for risk prevention</b>	Emphasis is placed on conducting awareness campaigns and sensitization meetings. These efforts aim to educate the community and the workforce (especially in construction sites) about the nature of GBV and its legal implications.
<b>Challenges in Service Delivery</b>	Despite the establishment of mechanisms for GBV response, challenges persist, including the need for integrated service centers and addressing the issue of victims' economic dependency on perpetrators.
<b>Economic and Social Factors are key driver for vulnerability</b>	Respondents highlighted the interplay of economic hardship and cultural norms in perpetuating GBV. Economic dependency, particularly of women on male family members, plays a significant role.
<b>Impact of Conflict and Displacement</b>	Conflict and displacement in regions like Cabo Delgado exacerbate GBV risks, leading to disrupted social networks and increased vulnerability

## Main recommendations from respondents

1. The project may support the strengthening of reporting and judicial processes: There's a need to enhance the effectiveness of reporting mechanisms and ensure proper judicial follow-through to build trust among victims.
2. Empowering women economically and ensuring their participation in decision-making processes is vital to reducing their vulnerability to GBV.
3. Establishing integrated service centers and involving community leaders in GBV initiatives are crucial for a more effective response.
4. Specific interventions are needed in high-risk areas, such as displacement camps and construction sites, where GBV risks are heightened.

## 7. GBV RISK ANALYSIS

The components of the road improvement project, while aimed at infrastructural development and community empowerment, could potentially pose risks of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) in various ways:

- **Sub-component 1.1:** Improvement and Maintenance of Road Network, Land Acquisition, and Resettlement: This can exacerbate **displacement vulnerabilities** considering that project locations are already facing these challenges, and the process of land acquisition and resettlement can disrupt social and familial structures. Displaced individuals, particularly women and children, may become more vulnerable to GBV as they might lose their traditional support networks and face increased financial and social instability. **Increased Interaction with Outsiders:** The influx of construction workers and other personnel, who are often predominantly male and not from the local community, can lead to **increased interactions with local populations**. This demographic change can increase the risk of SEA and SH, particularly in settings where there are significant **power imbalances and economic disparities**. **Temporary Housing Risks:** Resettlement often involves temporary housing solutions, which might lack adequate security measures. These conditions can expose women and girls to higher risks of violence, including sexual violence.

Considering that the project will create influx at community level resulting from offsite accommodation, this will increase the **pressure on host families**. Living conditions for most displaced and hosting communities are precarious. Their lack of access to food, shelter and other essential services increases their exposure to multiple protection risks, and vulnerability to abuse, exploitation, and trafficking. Over 90% of the displaced stay with host family and friends, exerting enormous pressure to host families and communities, many of them vulnerable and still recovering from the effects of Cyclone Kenneth. Other IDPs rent houses, but often at risk of eviction as they lack the resources to keep paying rent over extended period of time. Overcrowding and lack of privacy, sometimes 20-30 women, men, boys and girls sharing small living space, has heightened protection risks, including

GBV, rising numbers of child and teen pregnancies, exploitation and increased exposure to negative coping mechanisms including transactional sex. The socio-economic pressure on IDP-host families and communities, compounded suspicions of involvement with NSAGs is brewing family and communal tensions, threatening social cohesion among and between IDPs host communities<sup>14</sup>.

- **Sub-component 1.2:** Improving Bridges and Drainage Structures, construction and rehabilitation of bridges and drainage structures often occur in remote or **isolated areas**. Workers in these sites might be detached from their usual social norms and controls, potentially leading to an increase in risk-taking behaviors, including SEA and SH. Economic Dependency: The economic boost from such projects can create dependency situations where local populations, particularly women, might feel compelled to enter into exploitative relationships for economic benefits or employment opportunities.
- **Component 3: Institutional Strengthening and Project Management**  
 While the development of women-led community resilience committees and the promotion of women’s employment is positive, it can inadvertently expose women to the risks of GBV, SEA, and SH. Women taking on non-traditional roles or gaining economic independence can face backlash, including violence, from parts of the community resistant to these changes. The involvement of women in typically male-dominated sectors like construction can create power dynamics where women might face SH or feel compelled to tolerate inappropriate behavior to maintain employment or advancement opportunities. Lack of Reporting Mechanisms or Redress: In the absence of strong institutional frameworks for reporting and addressing GBV, SEA, and SH, women participating in these projects might be vulnerable to abuse without adequate means of seeking justice or support.

Table 2- GBV Risk analysis matrix

<p><b>GBV Risk Profile:</b></p> <ul style="list-style-type: none"> <li>• Sexual Violence: Occurs in the context of economic exchanges, particularly during food scarcity. Women and children, in desperate need of food, are coerced into sexual acts in exchange for sustenance.</li> <li>• Physical and Psychological Violence: Widespread across various districts, with a notable increase in crises like attacks and displacements, reflecting the heightened stress and disruption of social norms during crises.</li> <li>• Exploitation: Sexual exploitation linked to economic power dynamics is a significant concern, particularly affecting women and children. This is more pronounced in areas with construction and road work, where workers possess economic power over the local population.</li> <li>• Trafficking in persons: Sexual exploitation is linked to economic disparities, particularly affecting women and children in construction areas. Trafficking also remains a concern, with vulnerable individuals at risk.</li> </ul>
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<sup>14</sup> [https://www.globalprotectioncluster.org/sites/default/files/2022-07/2021\\_moz\\_protection\\_cluster\\_strategy\\_final\\_inputs\\_protection\\_partners\\_jan2021.pdf](https://www.globalprotectioncluster.org/sites/default/files/2022-07/2021_moz_protection_cluster_strategy_final_inputs_protection_partners_jan2021.pdf)



<b>Risk Analysis</b>	<b>Mitigation Measures</b>
<p>Threat : Which types of <b>GBV/SEA/SH/VAC</b> threats are present in project areas?</p> <p>Perpetrators of <b>GBV/SEA/SH/VAC</b></p> <ul style="list-style-type: none"> <li>• Community Members: Involved in cases of sexual violence, especially in exchange for food, highlighting the desperation and vulnerability in the community.</li> <li>• Family Members :Domestic violence and abuse from family members indicate deep-rooted issues in societal and familial structures.</li> <li>• Workers with Economic Power, under offsite accommodation and accommodated near resettlement camps for IDP's : Exploitation and abuse by these individuals, particularly in construction areas, underscores the misuse of economic power and lack of oversight or ethical constraints in these settings.</li> <li>• Workers on offsite accomodation can increase pressure on host families that are <b>already facing precarious living conditions</b> exacerbating vulnerability for SEA and trafficking</li> <li>• Armed security forces : Exploitation and abuse by</li> </ul>	<p>Reduce Threat What needs to change for the threat to be reduced?</p> <p>Community members</p> <ul style="list-style-type: none"> <li>• Conduct community-level awareness programs to address the issue of sexual violence and its consequences.</li> <li>• Educate community members about legal rights and the importance of consent.</li> <li>• Improve economic conditions through vocational training and job opportunities to reduce the desperation that leads to sexual exploitation.</li> <li>• Establish safe spaces and support groups for victims, and encourage community solidarity against GBV/SEA/SH/VAC.</li> </ul> <p>Family Members:</p> <ul style="list-style-type: none"> <li>• Ensure access to legal aid for victims and enforce laws against domestic violence more strictly.</li> </ul> <p>Workers with Economic Power</p> <ul style="list-style-type: none"> <li>• Workplace Policies and Training:** Implement strict anti-harassment policies and conduct regular training for workers and supervisors about workplace ethics and bystander interventions.</li> <li>• Establish clear mechanisms for reporting abuse and ensure that they are accessible and safe for victims to use.</li> <li>• Engage independent bodies to monitor working and living conditions and enforce ethical standards.</li> </ul> <p>Armed Security Forces</p> <ul style="list-style-type: none"> <li>• Provide comprehensive training for security forces on human rights, the consequences of GBV, and the importance of protecting civilians.</li> </ul>



<p>these individuals, particularly in active conflict areas,</p>	<ul style="list-style-type: none"> <li>• Implement strict measures to hold perpetrators accountable, including legal action and removal from positions of power.</li> <li>• Foster positive relationships between security forces and the community to build trust and cooperation.</li> </ul> <p>To reduce the threat of GBV/SEA/SH/VAC, the following overarching changes are needed:</p> <ul style="list-style-type: none"> <li>• Hire a Service Provider (SP) to implement a GBV Action Plan - where the project is classified as “high risk.”</li> <li>• Implement and enforce stricter laws against GBV, with clear consequences for perpetrators.</li> <li>• Engage communities in discussions about GBV/SEA/SH/VAC, challenging societal norms that perpetuate violence.</li> </ul> <p>Address poverty and economic vulnerability, which often contribute to GBV/SEA/SH/VAC.</p> <ul style="list-style-type: none"> <li>• Access to Resources: Provide victims with access to medical care, legal assistance, and psychological support.</li> <li>• Ensuring safe and secure living conditions for those displaced or in temporary housing.</li> </ul>
<p>Vulnerability: What influences vulnerability in project areas ?</p> <ul style="list-style-type: none"> <li>• Women and Children: Their economic dependence and societal norms make them particularly vulnerable to various forms of GBV.</li> <li>• Displaced Persons: They face increased risk in camps where basic needs are unmet, making them targets for exploitation and violence.</li> <li>• Local Community Members: Especially in areas of economic activity (like construction sites),</li> </ul>	<p>Reduce Vulnerability: What needs to change for the vulnerability to be reduced?</p> <ul style="list-style-type: none"> <li>• Offer educational programs and vocational training, particularly targeting women and children, to reduce economic dependence and provide them with more opportunities for self-sufficiency.</li> <li>• Conduct awareness campaigns focusing on the rights and protection of vulnerable groups, educating them about resources available for assistance and legal rights.</li> <li>• Create and maintain safe spaces, such as shelters and community centers, where vulnerable individuals, especially women, children, and displaced persons, can seek refuge and support.</li> <li>• Ensure availability of comprehensive healthcare services, including sexual and</li> </ul>

<p>where power dynamics are skewed, making them susceptible to exploitation and abuse.</p> <ul style="list-style-type: none"> <li>• <b>IDP displaced individuals, particularly if they are accommodated in offsite locations, can put a strain on host families. The added responsibility of providing for additional people can lead to heightened stress and tension.</b></li> <li>• Young women and girls : They face increased risk of child marriage, trafficking and HIV/ STI's including unwanted pregnancy.</li> </ul>	<p>reproductive health services, mental health support, and counseling for trauma for survivors.</p> <ul style="list-style-type: none"> <li>• Work with local community leaders and influencers to change societal norms that contribute to vulnerability. Promote a culture of respect and equality.</li> <li>• Develop community-based protection mechanisms where members are trained and empowered to identify and respond to signs of GBV and exploitation.</li> </ul>
<p>Capacity: What capacities do the community and its members already have at their disposal to mitigate these risks?</p> <ul style="list-style-type: none"> <li>• <b>Awareness Campaigns:</b> Conducted by health and justice departments to educate the community on <b>GBV/SEA/SH/VAC</b>, these campaigns are crucial in changing perceptions and increasing awareness.</li> <li>• <b>Multi-Sectorial Teams:</b> Teams involving health, justice, and social action departments work on sensitization and support, reflecting a comprehensive approach to tackling <b>GBV/SEA/SH/VAC</b>. This include UN agencies that have a GRM mechanisms .</li> <li>• <b>Community Leadership Engagement:</b> Involving local leaders in spreading</li> </ul>	<p>Increase Capacity: What needs to change in order to increase the community capacity to mitigate these risks?</p> <ul style="list-style-type: none"> <li>• Enhance reporting mechanisms to make them more accessible and user-friendly.</li> <li>• Ensure timely and effective responses to reports of GBV/SEA/SH/VAC.</li> <li>• Implement measures to protect those who report GBV from retaliation and stigma , encouraging more people to come forward.</li> <li>• Provide ongoing training for team members to stay updated on best practices and improve their skills in handling GBV/SEA/SH/VAC cases.</li> <li>• <b>Integrated Approach:</b>Promote more integrated approaches among different sectors (health, justice, social action) for a cohesive response to GBV/SEA/SH/VAC.</li> <li>• Strengthen the role of community and religious leaders in GBV initiatives, providing them with the necessary training and resources to become effective change agents.</li> <li>• <b>Community Involvement:</b>Encourage greater community involvement in planning and</li> </ul>

<p>awareness and information is critical for community-level change and support.</p> <ul style="list-style-type: none"> <li>• Reporting Mechanisms: Challenges in follow-through and judicial processes indicate systemic issues in addressing GBV effectively.</li> </ul>	<p>implementing GBV prevention and response strategies.</p> <ul style="list-style-type: none"> <li>• Collaborate with NGOs and INGOs: Foster partnerships with non-governmental organizations and international non-governmental organizations that specialize in GBV for shared learning and resource pooling.</li> <li>• Engage with UN Agencies: Utilize the expertise and mechanisms of UN agencies, especially those with GRM (Gender Mainstreaming) mechanisms, for broader impact and support.</li> </ul>
<p><b>UNDERLYING FACTORS:</b> Community Perceptions</p> <ul style="list-style-type: none"> <li>• Economic Hardship: Leads to exploitative situations, particularly in crisis-affected areas, where survival often takes precedence over legal and ethical considerations.</li> <li>• Cultural and Social Norms: Influence attitudes towards <b>GBV/SEA/SH/VAC</b> and hinder reporting, indicating a need for societal change and education.</li> <li>• Crisis Situations: Attacks and displacements exacerbate <b>GBV/SEA/SH/VAC</b> risks, indicating the need for targeted interventions in these contexts.</li> <li>• Dependency and Fear: Women's economic dependence and fear of repercussions for reporting GBV create a challenging environment for addressing these issues effectively.</li> </ul>	<p>Addressing the underlying factors that influence community perceptions related to GBV/SEA/SH/VAC involves a multi-faceted approach. The key elements to be addressed include:</p> <ul style="list-style-type: none"> <li>• Establish or strengthen social safety nets to provide basic needs and financial assistance to those in crisis-affected areas affected by labor influx.</li> <li>• Conduct extensive community education programs that challenge and change harmful cultural and social norms. This includes engaging men and boys in conversations about gender equality and the impacts of GBV/SEA/SH/VAC.</li> <li>• Utilize the influence of community leaders, religious leaders, and local influencers to advocate against GBV/SEA/SH/VAC and promote gender equality.</li> <li>• Advocate for Integrate GBV/SEA/SH/VAC prevention and response strategies into emergency response plans to ensure immediate and effective action during crises in project areas affected by labor influx</li> <li>• Develop a supportive environment for reporting GBV/SEA/SH/VAC, including legal aid, protection from retaliation, and confidentiality. Establish trusted and safe reporting channels.</li> <li>• Offer counseling and support services for survivors of GBV/SEA/SH/VAC, addressing</li> </ul>

- fears and trauma associated with their experiences.
- Educate the community about legal rights and protections against GBV/SEA/SH/VAC, making the law more accessible and understood by all community members.

This analysis highlights the complexity of GBV/SEA/SH/VAC in Cabo Delgado, where social, economic, and cultural factors interplay, creating a challenging environment for mitigation. Effective mitigation demands for a well coordinate approach of the myriad of stakeholders involving community, national/provincial and international, private/civil society/multilateral and public players. The efforts, involving community engagement, awareness campaigns, and multi-sectoral collaboration, are crucial but face significant implementation and effectiveness challenges, particularly in the context of ongoing crises.

**8. RELEVANT STAKEHOLDERS AND COMMUNITIES IN PROJECT AREAS**

Stakeholders involved in GBV programming in Niassa, Nampula and Cabo Delgado have roles, interests, and influence of different organizations and entities involved in addressing Gender-Based Violence (GBV).

Table 3- Relevant GBV stakeholders

Stakeholder	Role
<b>International and Multilateral Organizations</b>	<p>UN Women, WHO, UNICEF, UNFPA, OIM</p> <ul style="list-style-type: none"> <li>• These United Nations agencies bring international expertise, funding, and global best practices to address GBV. They are influential in shaping policies and can provide technical and financial assistance.</li> </ul> <p>Médecins Sans Frontières, Oxfam, CARE International, Save the Children, International Rescue Committee:</p> <ul style="list-style-type: none"> <li>• These NGOs offer on-the-ground support, including medical care, psychological aid, and emergency assistance. They are pivotal in implementing GBV programs in affected areas.</li> </ul>
<b>Human Rights and Advocacy Groups</b>	<p>Human Rights Watch, Amnesty International, Global Fund for Women</p> <ul style="list-style-type: none"> <li>• These organizations focus on advocacy, raising awareness, and influencing policy at both local and international levels. They can mobilize public opinion and hold governments accountable.</li> </ul>

<b>Local and National Organizations</b>	<p>Fórum Mulher, Associação Moçambicana de Mulheres de Carreira Jurídica, REDE CAME, MULEIDE</p> <ul style="list-style-type: none"> <li>• These are Mozambique-based organizations with direct insights into local challenges and cultural contexts. They are critical in grassroots mobilization, legal support, and advocacy.</li> </ul>
<b>Government institutions</b>	<p>District Services for Health and Women Affairs (SDSMAS), Provincial Directorate of health and Social Affairs, GAFMVV (Gabinete de Atendimento a Crianca e Familia e Vitima de Violencia).</p> <ul style="list-style-type: none"> <li>• The GOM organizations are part of multisectoral mechanism.</li> </ul>

## 9. INFLUENCE AND INTEREST OF STAKEHOLDERS

- **High Influence and High Interest:** UN agencies, Médecins Sans Frontières, Oxfam, CARE International, Save the Children, IRC. They have the resources and networks to effect change and are highly invested in GBV issues. In conflict and humanitarian contexts, most GBV service delivery and coordination is conducted by UNFPA in Cabo Delgado, Niassa, and Nampula through the GBV subcluster that is part of the protection cluster, although the health cluster must also be engaged.
- **High Influence but Variable Interest:** Human Rights Watch, Amnesty International, Global Fund for Women, Government institutions including INGD (national Institute of Disaster Management). Their influence is significant in advocacy and policy shaping, but their interest might vary depending on their broader agenda.
- **Moderate Influence and High Interest:** Local organizations such as Fórum Mulher and Associação Moçambicana de Mulheres de Carreira Jurídica. They have strong local influence and are highly committed to GBV issues but may lack extensive international networks.
- **Variable Influence and Interest:** Local communities and vulnerable populations. Depending on the project or situation, the influence and interest of these stakeholders can vary. For instance, some might be more influential in specific regions or concerning certain aspects of GBV/SEA/SH/VAC.

Coordination with local authorities and NGOs is essential for effective collaboration in various contexts, such as community development, disaster response, and humanitarian efforts. Key aspects include clear communication, defining roles and responsibilities, regular meetings for updates, resource allocation, joint planning, capacity building, community engagement, legal compliance, cultural sensitivity, monitoring and evaluation, flexibility, information dissemination, and conflict resolution. This collaboration aims to enhance the impact of initiatives and ensure the needs of communities are met.

## 10. GRIEVANCE REDRESS MECHANISM

### 10.1 Introduction

Considering the pervasive nature of gender-based violence (GBV) in post-conflict settings and the associated risks, such as societal norms that contribute to the underreporting of cases, a GBV-sensitive and survivor centered Grievance Redress Mechanism (GRM) must be implemented, particularly in conflict-affected areas. This GRM aims to effectively document and respond to GBV cases, including project-related instances of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).

The GRM must operate on a survivor-centric approach, with a primary focus on empowering GBV survivors by prioritizing their rights, needs, and wishes. This document offers an overview of the GRM's structure for the project. It is strongly recommended that the project establish an independent workflow within the GRM specifically dedicated to addressing GBV grievances<sup>15</sup>.

National evidence collected during the risk assessment reveals that a very small percentage of women report GBV experiences to formal services due to potential risks such as rejection stigmatization, retaliation, lack of awareness about available quality services, and pervasive impunity for GBV perpetrators. Therefore, all procedures outlined in this document take into account the findings and recommendations from the GBV risk assessment. Contractors, as per project appraisal documents, are mandated to have systems in place to address worker and community complaints, and these complaints should be recorded in the respective client's GRM management system for follow-up and reporting. GBV-sensitive reporting channels and GRM processes are integrated into the broader project GRM but will be tracked separately.

It is important that any GBV-prevention or response measure in a project, such as the GRM, follows a survivor-centric approach. This means empowering the survivor of GBV by prioritizing their rights, needs and wishes. A survivor-centered approach helps to promote a survivor's recovery and reinforce their capacity to make decisions for themselves, including about whether and which support services to access. It means ensuring confidentiality, informed consent, and access to good quality services, including health care, psychological support, security, and legal services as appropriate

### 10.2 Guiding Principles for Grievance Redress Mechanism

The CRRNP adheres to the fundamental guiding principles when addressing GBV-related complaints:

- **Safety and Well-Being:** Ensuring the safety of the complainant is of paramount importance at all times.

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<sup>15</sup> <https://openknowledge.worldbank.org/server/api/core/bitstreams/df20fd7c-83d4-451b-8882-946d337b1587/content>

- **Confidentiality/Anonymity:** Maintaining the confidentiality and anonymity of the complainant is essential. Relevant details should only be disclosed with the documented informed consent of the individual.
- **Survivor-Centered Approach:** Placing the survivor's choices, needs, safety, and well-being at the forefront of all actions and procedures. This approach is grounded in the following principles
- **Respect:** Respect the survivor's choices, wishes, rights, and dignity throughout the process.
- **Safety Priority:** Prioritizing the safety of the survivor in all actions.
- **Confidentiality:** Upholding confidentiality to empower individuals to choose whom they share their stories with.
- **Non-Discrimination:** Ensuring equal and fair treatment for all survivors, irrespective of their age, nationality, race, etc.

In conflict and displacement regions like Cabo Delgado, Niassa, and Nampula, where services are limited, literacy rates are low, and there are internally displaced populations, a GBV grievance mechanism should be tailored to these specific challenges. Key components include:

- Train local individuals, trusted by the community, to identify and report GBV incidents.
- Establish mobile units equipped with communication tools to facilitate reporting across different areas.
- Use local radio stations to broadcast GBV information and encourage reporting.
- Form committees of trusted community leaders considering gender dynamics at the community level to receive and document GBV complaints.
- Partner with organizations with existing reporting mechanisms to streamline reporting efforts.
- Establish confidential reporting spaces within communities or displacement camps.
- Train officers from affected communities to serve as intermediaries for reporting.
- Keep the community informed about the grievance mechanism's availability.
- Develop accessible materials explaining the reporting process.
- **Third-Party Hotlines:** Partner with organizations for toll-free reporting hotlines.

Customizing reporting channels, collaborating with existing mechanisms, and maintaining a survivor-centered approach are essential in addressing GBV in these challenging environments.

### 10.3 Reporting Channels

Is important that the GRM have multiple channels covering project affected communities and workplaces such as:

**Helpline and Reporting for Incidents:** In areas affected by conflict and displacement, it is crucial to have accessible reporting mechanisms for Gender-Based Violence (GBV) and Violence Against Children (VAC) incidents although some level of coordination will be needed with the GBV Cluster<sup>16</sup> (Coordinated by UNFPA) to ensure that incidents related to the project that may be received through the emergency line are reported to the project. The helpline and reporting channels are intentionally designed to overcome barriers such as language and ensure that survivors and witnesses can easily communicate their experiences. These channels not only provide a means for reporting but also offer immediate frontline support. Trained personnel are available to listen, provide guidance, and offer referrals to appropriate services. This immediate support is especially vital in regions with limited access to healthcare and social services, where survivors may urgently require medical and psychological assistance.

### **Grievance Boxes:**

- The introduction of Community Grievance Boxes (CGBs) is a community-focused approach to grievance resolution. These boxes are strategically placed within local communities to serve as a discreet means for community members to report GBV and related incidents. Oversight of these CGBs is a collaborative effort involving a joint committee, which includes representatives from the community, the PIU, and the inspection team. The CGBs empower local residents to take an active role in addressing issues within their communities. By facilitating anonymous reporting, they create a safe space for survivors and witnesses to come forward without fear of reprisal.
- Workplace Grievance Boxes are specifically designed to address incidents that may occur within the project's workforce or contractor teams. Managed by contractors in close collaboration with PIU. This approach not only promotes a safe and respectful work environment but also demonstrates the commitment of the project to addressing GBV comprehensively, both within and beyond the community.

### **Community Representative on GRC (through Community Liaison Officers – CLO)**

Community representatives are integral to the Grievance Resolution Mechanism (GRM). These individuals are selected from the local community and play a pivotal role in bridging the gap between the project and the neighboring community. Their responsibilities extend beyond serving as points of contact for reporting; they also serve as advocates for the community's concerns. By facilitating collaboration and dialogue, community representatives help ensure that the project's actions align with the community's needs and wishes. This approach fosters a sense of ownership and partnership, ultimately strengthening the effectiveness of the GBV grievance mechanism within the context of conflict and displacement regions.

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<sup>16</sup> [https://www.globalprotectioncluster.org/sites/default/files/2022-07/2021\\_moz\\_protection\\_cluster\\_strategy\\_final\\_inputs\\_protection\\_partners\\_jan2021.pdf](https://www.globalprotectioncluster.org/sites/default/files/2022-07/2021_moz_protection_cluster_strategy_final_inputs_protection_partners_jan2021.pdf)

## 10.4 Complaint Submission and Management Procedures

**Step 1: Reporting:** Incident reports can be made through various channels available such as the helpline, grievance boxes or community committees for the GRM face-to-face. Upon receiving a report, the GRM Screener categorizes the complaint by type and if the alleged perpetrator is related to the project for specific handling. This screening must be conducted within 24 hours and the complaint notification must be sent to PIU for information.

**NOTE:** Incidents of sexual assault and rape, child abuse, human trafficking, sexual exploitation, forced prostitution, or sex trafficking, are under mandatory reporting to legal authorities.

Complaints that are not related to the project will be referred to other stakeholders within the GBV multisectoral mechanism (Health providers, police, social services, etc.) according to the needs and as per the referral pathway.

**Step 2: Initial Response and Case Management:** Upon receiving the complaint the GRM Manager provides initial support to survivors and their families, ensuring safety and well-being under a survivor-centered approach<sup>17</sup>. This may involve referrals to medical services, counseling, or legal support. Consent and concordance are obtained from survivors or their legal representatives to proceed with the case. Survivor-centered care and confidentiality are paramount at this stage. GBV Service delivery and complaint investigation must be done under written consent provided by the survivor or their representatives. This phase can last till all survivor needs are met namely : health, legal, psychosocial and safety needs.

**Step 3: Administrative Investigation:** The GRM Coordinator assigns an investigation team to each GBV/VAC incident and investigation plan. The investigation team comprises individuals trained in GBV/SEA/SH/VAC case management, including external specialists when/where necessary. Investigations are conducted thoroughly, ensuring survivor privacy and dignity. Complaints that have criminal nature must be investigated by the legal authorities and administrative sanctions will be applied considering outcomes from criminal investigation. Administrative investigation must be conducted within 10 days with confidentiality and privacy.

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<sup>17</sup> A victim/survivor-centred approach places the rights, wishes, needs, safety, dignity and well-being of the victim/survivor at the centre of all prevention and response measures concerning sexual exploitation and abuse (SEA) and sexual harassment (SH).  
<https://interagencystandingcommittee.org/iasc-champion-protection-sexual-exploitation-and-abuse-and-sexual-harassment/iasc-definition-principles-victim-survivor-centered-approach>

**Step 4: Case Management:** Follow-up actions include regular check-ins with survivors to assess their well-being and continued support needs. Additionally, focus group discussions (FGDs) may be organized to gather community feedback and identify areas for improvement.

**Step 5: Corrective Action Planning and Sign-off:** Upon completing the investigation, the investigation team develops a corrective action plan to address the GBV/SEA/SH/VAC incident. Contractors, if implicated, are responsible for implementing these corrective actions. The plan is reviewed and approved by investors, with compliance actively monitored.

**Step 6: Lessons Learned and Feedback Loop:** The GRM team, in collaboration with stakeholders, regularly reviews the GRM process to identify lessons learned and areas for improvement. Feedback from survivors and the community is actively sought and used to enhance the GRM's effectiveness.

## 10.5 Roles and Responsibilities of GRM Stakeholders/Operators

Table 4- Roles and responsibilities of GRM stakeholders

Role	Responsibilities
<b>PIU Project Manager</b>	<ul style="list-style-type: none"> <li>Accept grievances and report to investors within 48 hours.</li> <li>Communicate relevant case updates to investors.</li> <li>Facilitate communication with contractors and management of administrative investigation</li> </ul>
<b>GRM Screener</b>	<ul style="list-style-type: none"> <li>Receive, sort, and register grievances.</li> </ul>
<b>GRM Case Manager</b>	<ul style="list-style-type: none"> <li>Provide initial support to survivors and families</li> <li>Share grievance receipts.</li> <li>Collect consent and concordance.</li> <li>Link survivors to available formal or informal services if needed.</li> <li>Oversee or monitor the cause analysis of incidents with contractors for prevention improvements</li> <li>Implement corrective action plans.</li> </ul>
<b>Community Liasion Officer (CLO)</b>	<ul style="list-style-type: none"> <li>The CLO acts as a bridge between the community and the organization, facilitating communication between the two parties. This involves relaying grievances to the relevant authorities within the organization.</li> <li>Mediation and negotiation and referring Grievances</li> <li>Directs grievances to the appropriate channels within the organization for formal investigation and resolution.</li> </ul>

	<ul style="list-style-type: none"> <li>• Monitor the progress of grievance resolution, ensuring that cases are being addressed in a timely and fair manner.</li> <li>• Provide feedback to the community, ensuring that complainants are informed about the resolution and any actions taken by the organization.</li> </ul>
<b>GRM Coordinator/ GBV Focal point</b>	<ul style="list-style-type: none"> <li>• Monitor grievances.</li> <li>• Maintain GBV incident logs.</li> <li>• Issue investigation confidentiality agreements.</li> <li>• Assign investigation teams for GBV/VAC incident reports.</li> <li>• Plan administrative investigations.</li> <li>• Evaluate investigation risks.</li> </ul>
<b>Investigation Team</b>	<ul style="list-style-type: none"> <li>• Investigate and document GBV/VAC incidents.</li> <li>• Prepare investigation reports.</li> <li>• Ensure survivor privacy and dignity</li> <li>• Develop corrective action plans.</li> </ul>
<b>Contractors</b>	<ul style="list-style-type: none"> <li>• Investigate and document GBV/VAC incidents involving their employees.</li> <li>• Develop and implement corrective action plans.</li> <li>• Monitor compliance with agreed-upon corrective actions.</li> <li>• Report back to the PIU on investigations and follow-up actions.</li> </ul>
<b>Community Grievance Committee (CGC)</b>	<ul style="list-style-type: none"> <li>• Manage grievance boxes.</li> <li>• Ensure community members' awareness of and access to the GRM.</li> <li>• Coordinate with GRM Field Manager for community-level responses.</li> <li>• Collaborate with local NGOs/CBOs.</li> </ul>

## 10.6 Appeals Process

**Step 1: Complainant's Request for Appeal** : If a complainant wishes to appeal a decision related to their GBV grievance, they should follow these guidelines:

- **Submission of Appeal:** The complainant must submit a written request for appeal to the Grievance Mechanism (GRM) within a specified timeframe, typically within 7 days from the date of the decision they wish to appeal. The appeal should clearly state the reasons for disagreement with the initial decision.

**Step 2: Appeal Review:** Once the appeal request is received, the GRM will initiate the review process:

- **Appeal Acknowledgment:** The GRM will promptly acknowledge receipt of the appeal request in writing, confirming the date of receipt and providing an estimated timeline for the appeal review process.
- **Review Committee Formation:** A dedicated review committee, comprising impartial individuals not involved in the initial investigation, will be formed to assess the appeal.
- **Access to Case Information:** The complainant and the respondent(s) will be provided with an opportunity to access and review all relevant case information, including investigation reports and evidence submitted during the initial investigation.
- **Review Meeting:** The review committee will convene to discuss the appeal, review the initial decision, and assess whether the decision aligns with established policies and procedures.

**Step 3: Appeal Decision :** Following the appeal review process, the GRM will make a final decision

- **Notification:** The complainant will be notified in writing of the appeal decision, along with the rationale for the decision, within [insert timeframe] days from the conclusion of the appeal review.
- **Decision Implementation:** If the appeal results in a change to the initial decision, the GRM will ensure the prompt implementation of corrective actions or remedies as necessary.

**Step 4: Closure:** The appeals process is considered concluded after the final decision is communicated to the complainant. The GRM will archive all relevant documents related to the appeal for record-keeping and future reference.

## 11. TRAINING AND CAPACITY BUILDING

Proper training is crucial for staff and stakeholders to be adequately prepared to address GBV issues professionally and empathetically. Before training development a needs assessment of the current understanding and skill level of staff and stakeholders regarding GBV issues should be conducted, especially in regards to GBV response in humanitarian and dealing with IDP and other vulnerable populations. This assessment must be done with armed security contractors to guarantee their engagement since inception.

### **Curriculum Development**

Separated curricula for PIU and managers are recommended and GBV providers must also be engaged so they can understand the project dynamics and requirements, especially on case management and survivor-centered approach.

Training content :

- GBV Fundamentals: Include modules on understanding GBV – its forms, impact, and the importance of addressing it.
- Legal and Ethical Guidelines: Relevant laws, ethical standards, and rights related to GBV.
- Communication Skills: Focus on sensitive communication techniques, active listening, and empathy.
- Grievance Handling Procedures: Detailed training on procedures to follow when a complaint is lodged including administrative investigation.
- Safety and Confidentiality : Emphasize the importance of maintaining confidentiality and ensuring the safety of the complainant.
- Compliance with GBV rules listed in the ESCMPS and C- ESMPs.
- GBV Case management under survivor-centered approach
- Data registration and reporting

## 12. STAKEHOLDER ENGAGEMENT AND COMMUNICATION PLAN

Considering the high mobile population and extreme vulnerability, it's important to utilize various channels like local radio, digital/social and paper media, and community meetings for dissemination. And partner with local NGOs, community leaders, and religious figures to disseminate information and gather feedback.

Massive campaigns using posters, flyers, and digital media to raise awareness about GBV and available support systems and include testimonials, case studies, and positive messaging to encourage community participation. Organize community forums and discussion groups to talk about GBV, its impacts, and GRMs and implement interactive activities like role-playing and community art projects to engage various age groups. Safe spaces for vulnerable populations with vocational training and job opportunities to alleviate economic desperation leading to exploitation and improve access to legal aid and enforcement of domestic violence laws.

Involving international organizations, human rights groups, local organizations, and government institutions is key. Their roles range from providing expertise and funding, to on-the-ground support, advocacy, and policy shaping. A GBV-sensitive Grievance Mechanism should be tailored to challenges in conflict-affected areas like Cabo Delgado, Niassa, and Nampula involving Training local individuals to report GBV incidents: Establishing mobile units for accessible reporting Use local media for GBV awareness: and Creating confidential reporting spaces in communities.

## 13. CONCLUSION

The Climate Resilient Roads for the North Project (CRNNP) in Mozambique, which focuses on enhancing road connectivity and climate resilience in Cabo Delgado, Niassa,

within its scope of work. This approach is critical given the heightened risks of GBV in these conflict-affected and environmentally vulnerable regions.

The project's environmental and social instruments, grounded in the Availability, Accessibility Acceptability and Quality (AAAQ) framework and the World Bank's guidelines, have revealed significant challenges related to GBV. These include the scarcity of specialized GBV services, particularly in emergency contexts, barriers in accessing existing services due to ongoing conflict, and the limited acceptability of support provided by non-specialized community and religious leaders. The socio-economic, cultural, and conflict-induced complexities of the project areas further exacerbate these challenges, making GBV risk mitigation and response a multifaceted issue.

## 14. RECOMMENDATIONS

In conclusion, addressing GBV within the Climate Resilient Roads for the North Project requires a comprehensive, multi-sectoral approach. By implementing these recommendations, the project can significantly contribute to mitigating GBV risks, enhancing the safety and well-being of affected communities, and ensuring the success of the infrastructure development in line with social and environmental safeguards. Based on the findings, the following strategic recommendations are proposed to enhance the effectiveness of GBV risk management in the project:

1. Strengthening Service Delivery and Specialized Services:
  - a. Enhance the availability of specialized GBV services in all project areas, focusing on emergency and conflict-affected regions like Cabo Delgado and Niassa by strengthening collaboration with available GBV providers formal and informal.
  - b. Strengthen service delivery by collaborating with UN agencies and local NGOs.
  - c. Implement mobile GBV service units in collaboration with UN agencies and local NGOs to reach remote and underserved areas. Ensure these units are equipped to provide immediate support and connect survivors with necessary resources.
  - d. Advocate for safe shelters and support centers, particularly for women and children affected by GBV.
  - e. Increase legal aid and support services for GBV survivors, facilitating their access to justice.
  - f. Foster collaboration with local NGOs, CSOs, UN agencies, and government bodies for a coordinated response to GBV.
  - g. Establish formal partnerships to pool resources and expertise for a more comprehensive approach.
2. Capacity Building for Local Women-Led Organizations, Community and Religious Leaders

- a. Increase capacity building and awareness programs for community and religious leaders to provide more informed and gender-sensitive support.
  - b. Foster a network of CSOs to challenge harmful norms and promote GBV prevention considering gender dynamics and cultural acceptancy.
  - c. Promote the use of survivor-centered approaches in all GBV services to enhance acceptability through training and dissemination of clear procedures
  - d. Collaborate with legal professionals and organizations to ensure survivors have comprehensive support.
3. Community Awareness Campaigns
- a. Conduct extensive community awareness campaigns to educate about GBV, its impacts, and available support systems.
  - b. Utilize various communication channels to reach a wide audience and challenge societal norms.
  - c. Foster an inclusive approach that involves men and boys as allies in the fight against GBV.
  - d. Implement safe spaces and other groups based interventions targeting host families to mitigate risks related to offsite accommodation
4. Comprehensive Training for Project Personnel and other project stakeholders
- a. Provide comprehensive training for all project staff, contractors, and associated personnel on GBV prevention and response.
  - b. Develop targeted training programs for local authorities, healthcare providers, and community leaders on handling GBV cases effectively and sensitively.
  - c. Strengthen the capacity of local stakeholders to respond appropriately to GBV incidents.
5. Accessible Grievance Mechanism
- a. Establish and maintain accessible, confidential, and efficient grievance mechanisms for reporting GBV incidents. Ensure these mechanisms are well-publicized within the project areas and understood by the community.
  - b. Implement a robust monitoring and evaluation system to assess the effectiveness of GBV interventions and make necessary adjustments.

## 15. GBV/SEA/SH RISK PREVENTION AND RESPONSE ACTION PLAN

Nr.	Risks	Mitigation Measures	Indicators	Responsible	Timeline	Estimated Budget
1	Insecure temporary housing during resettlement can increase the vulnerability of women and girls to sexual and physical violence.	Provide secure temporary housing for women and girls during resettlement to reduce their vulnerability to sexual and physical violence.	# Incidents of sexual and physical violence reported in the resettlement areas compared to baseline data	Resettlement Consultant/ PIU / Inspection Consultant	Q1	\$10,000
2	Construction in remote areas can lead to a detachment from social norms and increase risk-taking behaviors, including SEA and SH.	Promote adherence to social norms and ethical behavior in remote construction areas to counter detachment and risk-taking behaviors.	Feedback from workers on the understanding and adherence to ethical norms post-training.	Contractors/ GBV Service Provider/ inspection Consultant	Q2Q3Q4	\$5,000
3	Displacement due to land acquisition for road construction exacerbates the risk of GBV.	Offer counseling, legal assistance, and social support to those displaced due to road construction, mitigating the exacerbated risk of GBV.	Cases of gender-based violence (GBV) reported pre and post the implementation of support services.	PIU / GBV Service Provider	Q2Q3Q4	\$15,000
4	Women's involvement in construction and leadership in community resilience committees can exacerbate resistant to these gender role changes.	Implement training and sensitization programs to address resistance against women's involvement in construction and leadership roles. Include measures to protect women from harassment and discrimination	Number of training and sensitization programs conducted.	Contractors/ GBV Service Provider	Q2Q3Q4	\$55,000

5	Women working in construction may face SH and could feel compelled to tolerate inappropriate behavior to maintain employment.	Establish strict anti-harassment policies and confidential reporting mechanisms in construction workplaces to protect women from sexual harassment.	Number of harassment cases reported and resolved. - Employee awareness of anti-harassment policies, as measured by surveys.	Contractors/ GBV Service Provider	Q2Q3Q4	\$15,000
6	Women participating in the projects are vulnerable to abuse with limited avenues for redress.	Provide accessible and safe avenues for women participating in projects to report abuse and seek redress, ensuring confidentiality and protection from retaliation.	Utilization rate of reporting avenues. - Number of cases successfully redressed. - Feedback on the confidentiality and effectiveness of the reporting system	Contractors/ GBV Service Provider	Q2Q3Q4	\$60,000
7	Displaced persons living near workers' accommodations and camps are at an increased risk of exploitation and violence.	Implement patrolling, community watch programs, and awareness campaigns near worker accommodations and camps to protect displaced persons from exploitation and violence.	Reduction in incidents of exploitation and violence. - Community feedback on the effectiveness of watch programs	Contractors/ GBV Service Provider	Q2Q3Q4	\$20,000
8	Young women and girls may be particularly vulnerable to child marriage, trafficking, and HIV/STIs, including unwanted pregnancy, often exacerbated by the influx of labor in their areas.	Collaborate with local NGOs and law enforcement to prevent child marriage, and trafficking, and mitigate risks related to HIV/STIs, particularly focusing on young women and girls in labor influx areas.	Reported cases of child marriage, trafficking, and HIV/STIs	GBV Service Provider	Q2Q3Q4	\$10,000



9	Women's economic dependence and fear of repercussions in reporting GBV create significant barriers to effectively addressing these issues.	Facilitate economic independence for women through skill development and employment opportunities, and encourage reporting of GBV by ensuring anonymity and protection.	Number of women participating in skill development and employment opportunities.	GBV Service Provider	Q2Q3Q4	\$30,000
10	Displacements intensify GBV risks, including those posed by the presence of armed security forces.	Develop crisis response plans, including safe spaces and psychological support for victims of GBV for IDP	Number of victims accessing safe spaces and psychological support. - Effectiveness of crisis response plans, assessed through victim feedback.	GBV Service Provider	Q2Q3Q4	\$15,000
11	Workers, especially those in offsite accommodations near IDP resettlement camps, often exploit and abuse vulnerable individuals	Enforce strict codes of conduct for workers in offsite accommodations near IDP camps, with regular monitoring and swift action against perpetrators.	Compliance rate with codes of conduct and GBV trainings - Number of incidents reported and actions taken against perpetrators.	Contractors/ GBV Service Provider	Q2Q3Q4	\$70,000
12	Communities may have lack of information related to GBV risks related to the project	Develop a robust community awareness on GBV /SEA risks related to the project	Number of Awareness Campaigns Conducted Increase in the number of GBV/SEA cases reported following the awareness drives.	GBV Service Provider	Q2Q3Q4	\$120,000

		Level of active participation from the community in these campaigns.				
13	Service delivery in project areas are fragmented and low resourced	Implement mobile services and case management under survivor centered approach	Number of Mobile Units Operational: The count of mobile units or teams that are actively providing services. Geographical range covered by the mobile services. Number of survivors accessing the mobile services.	GBV Service Provider	Q2Q3Q4	\$30,000
					<b>Total</b>	<b>\$455,000</b>

## REFERENCES

1. UNESCO Education Reports on Mozambique.
2. World Health Organization's Mozambique Health Data.
3. Mozambique National Statistics on Gender and Employment.
4. Reports by NGOs operating in Nampula, Niassa, and Cabo Delgado.
5. Mozambique's Government Publications on Women's Political Participation.
6. Climate Change Impact Reports by Environmental NGOs in Mozambique.
7. UNESCO and WHO Reports on Education and Health in Mozambique.
8. Mozambique National Statistics on Gender, Climate Change, and Displacement.
9. Studies on Gender and Climate Change in Southern Africa.

## APPENDIXES

### Appendix 1- List of CSO working on GBV in project areas

Organization	Activities/Focus Areas – Nampula
AENA (National Association of Rural Extension)	<ul style="list-style-type: none"> <li>Dissemination of family and domestic violence laws</li> <li>Gender and HIV/AIDS debates.</li> <li>Gender, participation, and leadership discussions</li> <li>Integration of women in the adult literacy and agriculture education process</li> <li>Agriculture and natural resources.</li> </ul>
AMR (Association of Rural Women)	<ul style="list-style-type: none"> <li>Dissemination of anti-violence laws</li> <li>Gender and violence discussions.</li> </ul>
AMORA – Association of Women for Girl Support	<ul style="list-style-type: none"> <li>Women's rights.</li> <li>Gender-based violence.</li> </ul>
Activa Women's Rights	<ul style="list-style-type: none"> <li>Activities related to women's rights.</li> </ul>
NUGENA – Nampula Gender Center	<ul style="list-style-type: none"> <li>Defense of Women's Human Rights.</li> </ul>
OPHENTA- Association of Women and Support for Girls	<ul style="list-style-type: none"> <li>Governance with a focus on human rights.</li> <li>Human rights of women and girls.</li> </ul>

<ul style="list-style-type: none"> <li>Organization</li> </ul>	<ul style="list-style-type: none"> <li>Activities/Focus Areas – Niassa</li> </ul>
<ul style="list-style-type: none"> <li>Estamos-Community Organization</li> </ul>	<ul style="list-style-type: none"> <li>Water and Sanitation</li> <li>HIV/AIDS, Natural Resources, Governance, and Social Audit (with women and children as a cross-cutting area).</li> </ul>
<ul style="list-style-type: none"> <li>FOFEN-Forum of Women's Associations of Niassa</li> </ul>	<ul style="list-style-type: none"> <li>GBV prevention.</li> <li>Women, Peace, and Security.</li> <li>Women's participation in politics.</li> </ul>

Organization	Activities/Focus Areas – Cabo Delgado	Contact
AME-Women Hope Association	<ul style="list-style-type: none"> <li>Defense of women's rights.</li> </ul>	

	<ul style="list-style-type: none"> <li>• Prevention and mobilization against VBG (Gender-Based Violence).</li> </ul>	
DJUMULA – “Solve Everything” (Cabo Delgado)	<ul style="list-style-type: none"> <li>• Gender-based violence.</li> </ul>	
OCUPALI - Believe	<ul style="list-style-type: none"> <li>• Gender-based violence.</li> </ul>	
PROMURA- Women and Girl Protection Association	<ul style="list-style-type: none"> <li>• Gender-based violence.</li> </ul>	
UNU WAWATIANA – Women's Growth	<ul style="list-style-type: none"> <li>• Gender-Based Violence.</li> </ul>	
UNUWATHIANA VBG	<ul style="list-style-type: none"> <li>• Community awareness through radio.</li> </ul>	

## Appendix 2- Code Of Conduct for Contractors Personnel Including Armed Security Workers

We are the Contractor, [enter the name of Contractor/Subcontractor] also referred to herein as ‘the company’, we have signed a contract Nr [enter the Contract Number and Location] with ANE – National Roads Administration, IP also referred to herein as ‘the employer’ for construction and rehabilitation of rural roads and bridges in Zambézia and Nampula provinces as part of the **Climate Resilient Roads for the North in Northern Region of Mozambique**. It is anticipated that the civil works will be carried out between [enter date] and [enter date].

The Contractor/subcontractor is committed to ensuring that the project is implemented in a way that minimizes any negative impacts on the local environment, communities, and workers. This will be done by respecting environmental, social, Gender Based Violence, Sexual Exploitation, Abuse, Sexual Harassment and Violence Against Children (GBV/SEA/SH/VAC), health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met.

To ensure that all those engaged in the Works are aware of these commitments, the Contractor/subcontractor commits to the following core principles and minimum standards of behavior that will apply to all contractor/subcontractor employees, associates, and representatives, including subcontractors and suppliers, without exception. This Code of Conduct applies to the companies, to the contractors, subcontractors, consultants, and suppliers, contracted under the CRRNP in all project locations, accommodations onsite and offsite. Hereinafter referred to as Contractors/ Subcontractors.

### General

1. The contractor/subcontractor, and thus all employees, associates, representatives, subcontractors, and suppliers, are committed to complying with all relevant national laws, rules, and regulations. Additionally, in humanitarian settings, they are obliged to adhere to specialized international laws designed to protect internally displaced populations.

2. Comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect from GBV/SEA/SH/VAC, the health, safety, and well-being of communities of other Contractor's Personnel and any other person.
3. The contractor/subcontractor commits to treating women, children (persons under the age of 18), and men with respect regardless of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, property, birth or health status, including HIV status.
4. The contractor/subcontractor will provide a workplace environment where unsafe, offensive, abusive, or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation. It will prohibit demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior among all contractor/subcontractor employees, associates, and representatives, including subcontractors and suppliers.

## **Health and Safety**

5. The contractor/subcontractor will prohibit workers from working under the influence of alcohol or drugs, including medications that impair cognitive function.
6. The contractor/subcontractor will ensure that adequate sanitation facilities are available on-site and at any worker accommodations provided to those working on the project. This includes providing separate and lockable facilities for men and women.
7. Maintain a safe working environment, including by:
  - a. ensuring that workplaces, machinery, equipment, and processes under the control of each person are safe and without health risks.
  - b. provide necessary Personal Protective Equipment (PPE), for their respective workers and subcontractors.
  - c. provide for the use of appropriate measures related to chemical, physical, and biological substances, and agents.
  - d. follow the applicable emergency operating procedures.
  - e. All security or enforcement personnel involved in the project shall at all times fulfill their duties by the law, serving the community, and protecting all persons against illegal acts, in line with the high degree of responsibility required by their profession.
    - i. During their duties, project personnel must respect and uphold the human rights and dignity of all individuals.
    - ii. These rights are protected by both national and international laws, including but not limited to the Universal Declaration of Human Rights and related conventions.
    - iii. The use of force should be exceptional and proportionate to the objective to be achieved.

- iv. Firearms are an extreme measure and should be used only in dire circumstances.
- v. No personnel may inflict, tolerate, or justify torture or other cruel treatments, regardless of circumstances.

## **Sexual Exploitation and Abuse**

- 8. The contractor/subcontractor will prohibit all forms of GBV/SEA/SH/VAC and implement penalties against workers who perpetrate GBV/SEA/SH/VAC. Penalties will range from warnings to termination of a worker's employment by the company and may include reporting the perpetrator to the police or other legal actions.
- 9. The contractor/subcontractor understands that GBV/SEA/SH/VAC includes acts that inflict physical, sexual, or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. The different forms of GBV are understood to include:
  - a. Rape: physically forced or otherwise coerced penetration — however slight —of the vagina, anus, or mouth with a penis, another body part, or object. Rape includes marital rape and anal rape/sodomy. The attempt to do so is known as attempted rape. The rape of a person by two or more perpetrators is known as gang rape.
  - b. Sexual Assault: any form of non-consensual sexual contact that does not result in or includes penetration. Examples include attempted rape, as well as unwanted kissing, fondling, or touching of genitalia and buttocks.
  - c. Sexual Harassment: unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts but always involves power and gender dynamic in which a person in power uses their position to harass another based on their gender. Sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome. Examples include looking somebody up and down; kissing, howling, or smacking sounds; hanging around somebody; whistling and catcalls; in some instances, giving personal gifts.
  - d. Sexual Favours: a form of sexual harassment that includes making promises of favorable treatment (e.g. promotion) or threats of unfavorable treatment (e.g. loss of job) dependent on sexual acts—or other forms of humiliating, degrading, or exploitative behavior.
  - e. 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. Sexual exploitation can also include lying about one's intentions, position, or influence for sexual purposes.
  - f. Physical Assault: an act of physical violence that is not sexual. Examples include: hitting, slapping, choking, cutting, shoving, burning, shooting, or use of any weapons, acid attacks, or any other act that results in pain, discomfort, or injury.

- g. Child Marriage: refers to any formal marriage or informal union between a child under the age of 18 and an adult or another child.
- h. Trafficking in Persons: refers to any activities such as the recruitment, transportation, transfer, harboring, or receipt of individuals through means of force, fraud, or coercion, with the intention of exploitation. This includes, but is not limited to, forced labor, sexual exploitation, and various forms of contemporary slavery.
- i. Denial of Resources, Opportunities, or Services: denial of rightful access to economic resources/assets or livelihood opportunities, education, health, or other social services. Examples include earnings forcibly taken by an intimate partner or family member, a woman prevented from using contraceptives, or a girl prevented from attending school).
- j. Psychological / Emotional Abuse: the infliction of mental or emotional pain or injury. Examples include threats of physical or sexual violence, intimidation, humiliation, forced isolation, stalking, harassment, unwanted attention, remarks, gestures, or written words of a sexual and/or menacing nature, or destruction of cherished things.

## **Implementation**

1. The contractor/subcontractor will encourage all employees, volunteers, and subcontractors to report suspected and actual acts of GBV/SEA/SH/VAC by a worker, whether in the same contractor/subcontractor or not.
2. Disseminate the Code of Conduct for Contractor/subcontractor Personnel in local communities and engage with communities so that they understand the content of this Code. Through this engagement, the contractor/subcontractor will encourage communities to report suspected and actual acts of GBV/SEA/SH/VAC by a worker.
3. Follow the GRM protocols in all suspected and actual SEA/SH incidents and GBV response protocols and use the protections in place to protect survivors.
4. Support application on sanctions against contractor staff involved in SEA/SH incidents.
5. Promote non-retaliation measures against anyone who reports violations of this Code of Conduct.
6. Ensure that the staff of the Contractors is properly supervised when the works are taking place in places where children are, such as schools, kindergartens, boarding schools, among others.
7. Ensure that Contractor's staff do not invite or entice unaccompanied children into their accommodation, either inside or outside the camp, unless the children are at immediate risk of injury, physical danger, or death and shall report immediately to the Contractor's or control and monitoring staff.
8. Ensure that staff of the Contractor's do not invite women (over 18 years old) to their accommodation sites, either inside or outside the camp.
9. Ensure that Contractor's staff do not use any computers, mobile phones, video cameras, cameras, or social media to exploit or harass children or access child exploitation material, including child pornography.
10. Ensure that Contractor's staff with a history of sexual exploitation, abuse, and harassment are not hired.

11. Collaborate in the implementation of risk mitigation activities related to Gender-Based Violence, Sexual Exploitation, Abuse and Harassment, Prevention and mitigation of sexually transmitted infections (HIV/AIDS/STI) as well as the exploitation of underage for child labor through training, root cause analysis meetings, a safety audit of the camps, placement and dissemination of communication material including complaint boxes.
12. Ensure that the Project Liaison Committee improve communication between the project and the community and implementation immediate mitigation measures (Containment training, community consultation, and community workshops):

**Raising Concerns**

1. If Contractor's observe behavior that represents a breach of this Code of Conduct, should report the breach immediately; by contacting: Contact [insert name of ANE's social expert].
2. Call [Insert number] to contact the project's grievance line.

**Consequences of breaching the code of conduct**

Any breach of this Code of Conduct by the Contractors will result in serious consequences, including contract termination, report to legal entities, administrative penalties according to severity of the CoC violation

I do hereby acknowledge that I have read the foregoing Contractor/subcontractor Code of Conduct, and confirm that I am authorized to sign in on behalf of the company.

For the Contractor's personell

Name of: [insert name]

Signature: \_\_\_\_\_

Date: (day /month/ year): \_\_\_\_\_

Countersignature of the Contractor's authorized representative:

Signature: \_\_\_\_\_

Date: (day/ month/ year): \_\_\_\_\_