



Infrastructure & Cities for Economic Development

Sexual exploitation, abuse and harassment (SEAH) Infrastructure Tool

DFID Safeguarding Unit

29th March 2019



Contents *(click headings for links to sections)*

<i>1. Introduction</i>	<i>3</i>
<i>Key definitions</i>	<i>6</i>
<i>Key SEAH considerations for infrastructure projects</i>	<i>7</i>
<i>Layout of the Tool</i>	<i>10</i>
<i>2. SEAH in Infrastructure Tool</i>	<i>12</i>
<i>Stage 1: Inception</i>	<i>12</i>
<i>Stage 2: Feasibility</i>	<i>14</i>
<i>Stage 3: Strategy / Planning</i>	<i>17</i>
<i>Stage 4: Design and Procurement</i>	<i>19</i>
<i>Stage 5: Construction</i>	<i>21</i>
<i>Stage 6: Testing and Commissioning</i>	<i>26</i>
<i>Stage 7: Handover and Operation</i>	<i>28</i>
<i>Stage 8: Delivery of Services</i>	<i>30</i>
<i>ANNEXES</i>	<i>32</i>
<i>Annex A: Case Studies</i>	<i>32</i>
<i>Annex C: List of Relevant DFID VAWG Helpdesk Queries</i>	<i>34</i>
<i>Annex D: Upcoming Resources</i>	<i>35</i>
<i>Annex F: SEAH Tool Summary Checklists – Recommended Actions and Priority Risks</i>	<i>39</i>

Sexual Exploitation, Abuse and Harassment in Infrastructure Projects – Safeguarding Tool

1. Introduction

The infrastructure sector presents a high-risk environment for incidents of sexual exploitation and abuse and sexual harassment (SEAH). DFID's Safeguarding Unit has identified infrastructure as a priority focus area and has commissioned this tool to identify and mitigate SEAH risks across DFID's infrastructure programming.

This tool has been developed specifically for DFID advisers, programme managers and Senior Responsible Officers (SROs) working on programmes that involve infrastructure (either as the main programme focus or as a component). It will help them to:

- Familiarise themselves with potential SEAH risks within infrastructure investments;
- Improve the identification, management and oversight of SEAH risks on infrastructure projects; this includes projects where construction, maintenance and/or upgrading of infrastructure (transport, energy, water and sanitation, waste, schools/health clinics, etc.) takes place;
- Understand what actions they can take themselves – and require of partners – that will help identify, mitigate, manage and respond to SEAH risks or incidents in the downstream delivery of infrastructure programmes (including taking a survivor-centred approach);
- Structure discussions with delivery partners and think about how/where to seek information during formal and informal review points;
- Strengthen their oversight capacity to manage and/or escalate SEAH incidents.

This tool is not intended as comprehensive guidance, rather it sets out the priority risks and common weak spots where SEAH can manifest within infrastructure projects. It supplements the DFID Infrastructure Handbook¹ which includes detailed guidance for DFID staff on all aspects of infrastructure programming.

The tool is set out according to the infrastructure project cycle. The diagram below shows the cycle stages that are covered by the tool – from inception, to construction, through to service delivery.

¹ Under development – contact Hayley Sharp, SRO of the Infrastructure and Cities for Economic Development (ICED) programme, for further information (h-sharp@dfid.gov.uk)

Infrastructure in DFID Programming

In practice, there are a number of ways in which DFID staff engage with infrastructure. In some cases, infrastructure is the focus of a DFID programme - i.e. the programme is designed to deliver infrastructure, or DFID works with others to enable its delivery (e.g. through developing new policies or institutional reform). In other cases, infrastructure is a component within a broader programme (e.g. irrigation or feeder roads as part of a livelihoods programme). There are instances, too, where the programme may *interact* with infrastructure delivery even though it is not engaging *directly* with infrastructure (e.g. an education programme operating in a school where classrooms are being upgraded through a separate donor programme). In this instance, risks relating to infrastructure can impact the DFID programme.

In any of these cases, the infrastructure project cycle generally follows the stages shown in Figure 1 below.

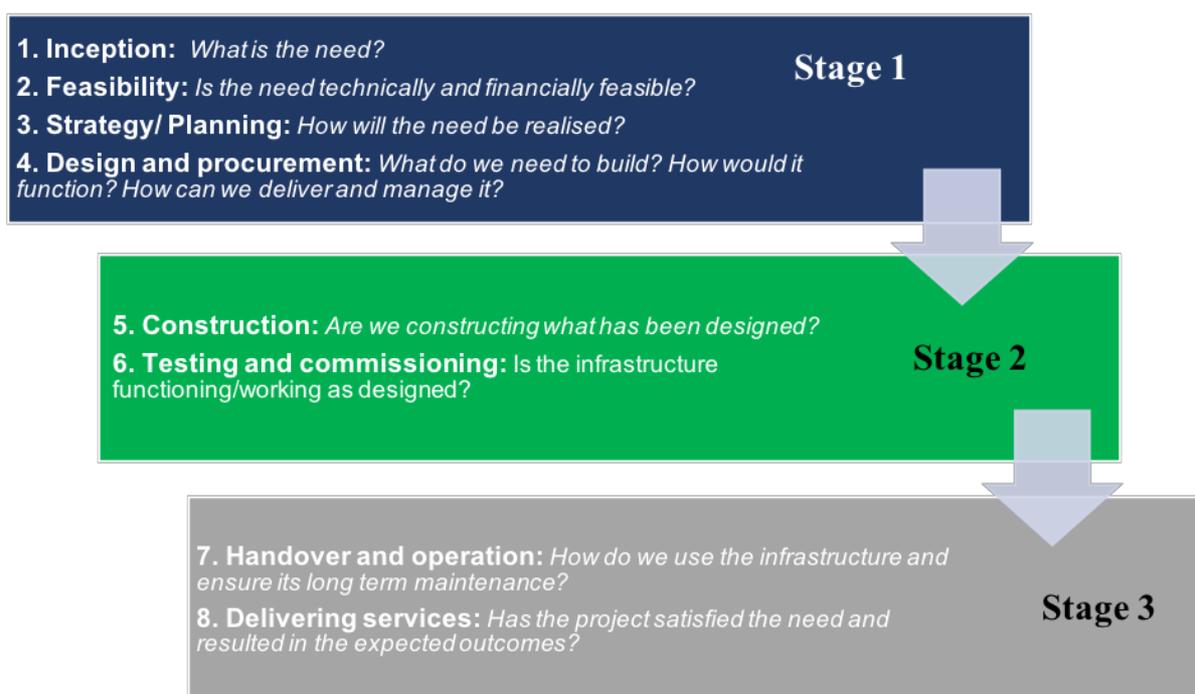


Figure 1: Infrastructure Project Cycle

It is important to note that there will be an element of overlap between stages as there are no clear lines between them. Activities may run across stages and, therefore, flexibility is important in the application of the safeguarding measures against SEAH that are recommended in this tool. Some measures will be applicable across two or more stages.

How the infrastructure project cycle relates the DFID programme cycle will vary from programme to programme, depending on the nature and extent of the programme's engagement with infrastructure (as explained above). However, the diagrams below illustrate what this could look like on two types of DFID programme: where infrastructure is the main focus; and where infrastructure is a component or a broader programme.

Infrastructure project stages mapped against DFID's funding procedures

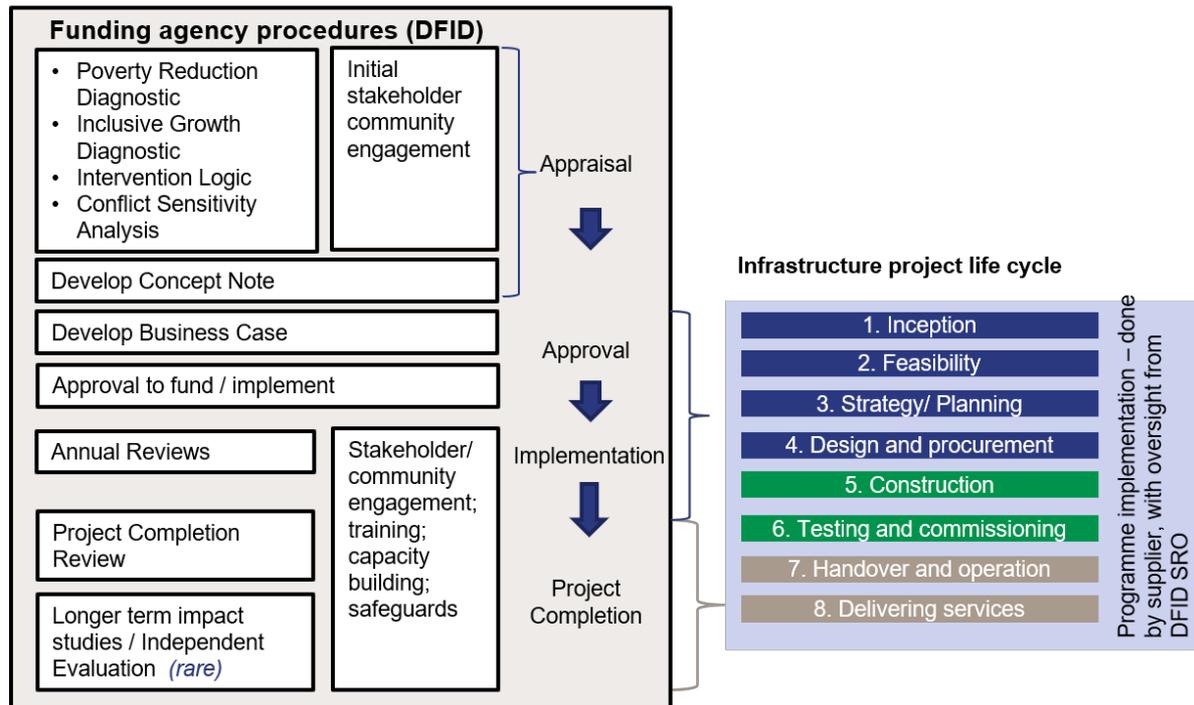


Fig 2: Example where infrastructure is a component of the DFID programme

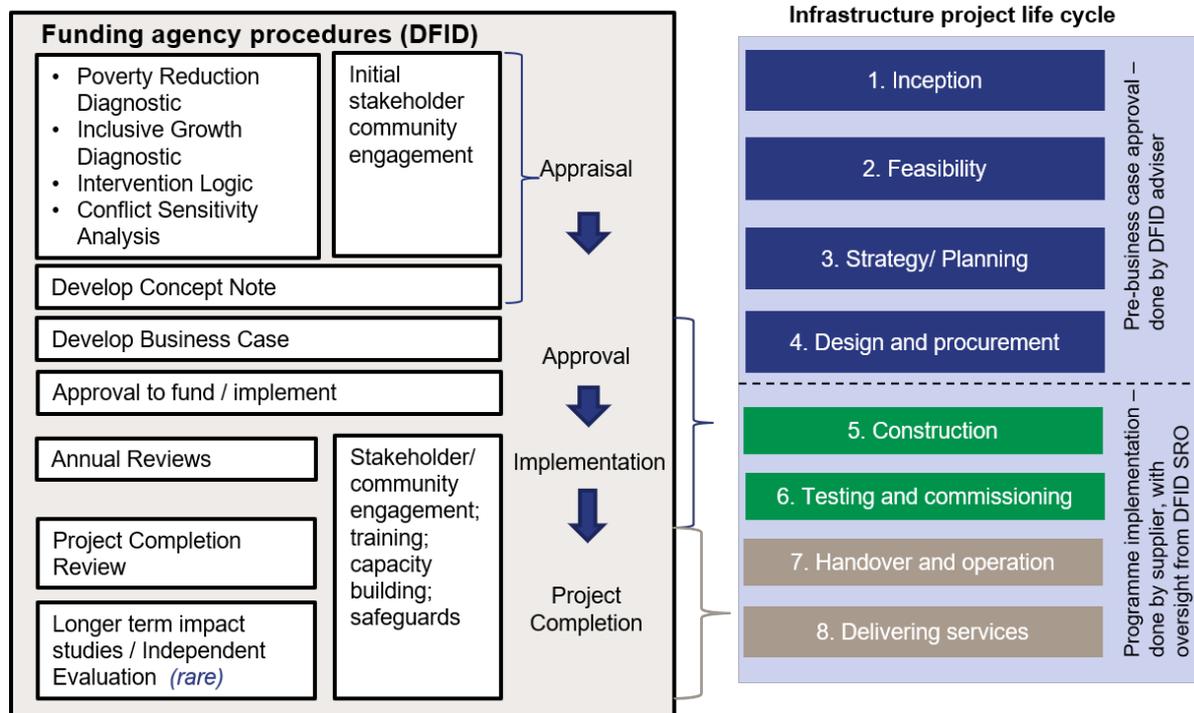


Fig 3: Example where infrastructure is the focus on the DFID programme

Key definitions

Institutional safeguarding

This is an organisational system to prevent harm or unethical behaviour being perpetrated by individuals employed or contracted by an organisation. Includes the protection of beneficiaries and staff across the supply chain (e.g. contractors, subcontractors, suppliers etc.). Ensures activities do not lead to adverse impacts for anyone in contact with the organisation or project. Protects against misconduct ranging from fraud and corruption to workplace bullying and sexual exploitation. This tool refers specifically to sexual exploitation, abuse and harassment (SEAH).

Key resources:

- [UN Secretary-General's bulletin on Special Measures for Protection from Sexual Exploitation and Sexual Abuse](#)
- [DFID's Enhanced Due Diligence](#)
- [Donors: Commitments to tackle sexual exploitation and abuse and sexual harassment in the international aid sector](#)

Institutional safeguards are the first step to having a strong risk management system in place.

Programmatic safeguards

These processes and systems are aimed at avoiding, minimising and mitigating any negative environmental and social (E&S) impacts of a project, including protecting the rights of those who could be affected or marginalised by the development process (i.e. Do No Harm). Programmatic safeguards aim to avoid, minimise and mitigate negative consequences and to enhance positive developmental impact (e.g. skills development for those affected by the project).

For infrastructure projects, the IFC Performance Standards offer a comprehensive framework covering the full spectrum of E&S risks and opportunities; you will find most multilateral development banks (MDBs) have their own standards, modelled closely on the IFC Standards. For example, the World Bank Environmental and Social Framework, which was recently updated to include greater focus on areas such as protecting people living with disabilities, aligns with the IFC Performance Standards and is a more relevant resource for government/aid-funded infrastructure; the IFC standards are more focused on private sector-financed projects.

Key Resources:

- [World Bank Environmental and Social Framework \(updated 2018\)](#)
- [IFC Performance Standards 2012](#)

Sexual Exploitation, Abuse and Harassment (SEAH)

SEAH risks fall under both institutional and programme safeguards and constitute the following:

Sexual Exploitation, as defined by the [UN Secretary-General's bulletin ST/SGB/2003/13](#), constitutes any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another. It is a broad term, but it includes transactional sex, solicitation of transactional sex and exploitative relationships.

Sexual Abuse, as defined by the UN Secretary-General's bulletin ST/SGB/2003/13, means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (as defined under the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not a defence. "Sexual abuse" is a broad term, which includes a number of acts, including "sexual assault" for

example, (rape, attempted rape, forcing someone to perform oral sex / touching) “sexual offence” and “sexual offence against a child”.

Sexual Harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment. “Sexual harassment” in a UN context primarily describes prohibited behaviour in the workplace against another staff member or related personnel, which could also include nationals of the host state. According to ST/SGB/2008/5 and similar directives it involves any unwelcome sexual advance; request for sexual favours; verbal or physical conduct or gestures of a sexual nature; or any other behaviour of a sexual nature that might reasonably be expected, or be perceived, to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Beyond UN regulations, the definition of sexual harassment does not require a link to the work environment. Sexual harassment can be perpetrated against beneficiaries, community members, citizens, as well as staff, personnel, etc.

Key SEAH considerations for infrastructure projects

When considering SEAH in infrastructure projects, it is important to take a context-specific approach. The risks and impacts will depend on not only on the construction model and other project activities on the ground, but also the wider risk environment. For example, SEAH prevention measures need to take into account any existing social attitudes or norms towards violence against women or harassment in the workplace (SEAH may be more prevalent in communities where behaviours that constitute workplace harassment are generally tolerated). It is critical to ensure a contextually-appropriate and survivor-centred approach (i.e. one that prioritises the safety, anonymity and well-being of victims/survivors of SEAH).

Here are some SEAH risk factors commonly associated with infrastructure projects to consider:

- The **influx of workers** – during the construction and operation phases workers are often employed informally (no formal contracts or background checks), are predominantly male, often come from outside the project area and are only present for a short time. They come into close contact with all community groups in a project area and, therefore, the risk of SEAH is increased. The size of the workforce and absorptive capacity of the host community are critical factors to consider when assessing SEAH risks.
- **Changes to power dynamics** – the arrival of a large workforce can disrupt the power dynamics in a community and within households, as women in the community come into contact with mobile workmen in a variety of ways. Infrastructure projects can also offer opportunities for women to earn an income (through direct employment on the project during construction or operation, or indirectly via associated services such as catering) – this, too, can alter power dynamics in the community and within households.
- **Land acquisition and resettlement** – if the project requires land to be acquired, it can lead to the physical or economic displacement of people/communities requiring compensation and support to those whose home and/or livelihoods have been affected. This can heighten vulnerability of marginalised and vulnerable groups (e.g. female-headed households, those working in the informal sector, people with disabilities) and expose them to risks of SEAH. Marginalised and vulnerable groups may be exposed to risks of SEAH perpetrated by those managing the land acquisition and resettlement process. If national legislation precludes certain groups’ formal rights to land titles/ownership, their exposure to SEAH could be further increased. Vulnerability can also be exacerbated through these processes for example if these

groups are left out of consultations and decision-making around compensation and livelihood restoration support.

- **Transportation** – infrastructure projects often involve transportation of materials to and from work sites; new access routes may be created, or workers may use existing access routes used by communities and thereby coming into close contact with all community groups. Women and other vulnerable groups from the community, who are employed by the project, may be exposed to risks on their way to/from the work site if provisions for safe transport are not made.
- **Construction phase** – this is a particularly high-risk stage for SEAH. This is due in part to a typically larger workforce engaged during construction, the influx of temporary workers on short contracts who either live in on-site accommodation or within the host communities, but also because this is often the stage at which the factors listed above will physically manifest in the project – i.e. this is when land acquisition and resettlement would occur, when transportation of materials, equipment and workers would happen, and when community members would come into physical contact with project staff. However, actions can be taken in the earlier project stages to ensure SEAH is avoided in the construction phase.
- **Operation/ service delivery phase** – SEAH risks can often continue into the operation and service delivery phase, for example if the new infrastructure being built is a road. This phase also presents another set of SEAH risks if there is an operational workforce, if there are operation phase contractors (e.g. engagement of security, gardeners, cleaners, caterers etc.) and during maintenance activities when external contractors may again be brought in to carry out works. For example, community members employed for long-term maintenance work, particularly more vulnerable populations (e.g. single mothers, people living with disabilities) and those new to the workforce could be at particular risk of SEAH. Locations and points at which SEAH can occur also differ from earlier stages of the project cycle (e.g. through tariff/toll collection activities) as do potential perpetrators of SEAH (e.g. service delivery staff from the host communities could abuse their relative position of power). DFID has limited influence at the service delivery stage, having handed over the project to the client. It is, therefore, essential that SEAH risks during service delivery are properly considered at earlier stages to avoid unintended negative consequences following handover.

In addition to these direct SEAH risk factors, there are also important non-SEAH risks that are commonly associated with infrastructure projects, and which can serve as **pathways to SEAH** given their linkage with vulnerable groups.

The following risks are considered ‘red flags’ or indicators of potential SEAH risks:

- ! **Health and safety** (H&S) – H&S standards in many developing countries are notoriously poor. Vulnerable workers (informal workers, women, etc) can be forced to work in dangerous or unhealthy conditions. This often goes unreported due to fear of losing their jobs.
- ! **Persons living with disabilities** are at most risk²; there is evidence that men and boys also experience SEAH but reporting is low.
- ! **Child, bonded or forced labour (i.e. modern slavery and human trafficking)** - is a significant global problem for the construction sector, with high profile cases of men, women and children trafficked during large infrastructure projects or to work in the

² DFID Disability Inclusion Helpdesk query on Sexual exploitation, abuse and harassment of people with disabilities: mapping of the evidence (2019) – contact enquiries@disabilityinclusion.org.uk to access this document.

construction industry (e.g. construction associated with the 2022 football World Cup in Qatar).³ The links between bonded labour and construction, particularly in the Indian Sub-Continent, are well documented.⁴

- ! **Corruption** – There are points in the project cycle at which risks of corruption are heightened (e.g. collection of user fees, payment for compensation for land acquisition, trade points such as truck stops or border posts). These can also be points at which SEAH risks increase, given that they involve interaction with vulnerable persons.
- ! **Engagement of security companies/ guards** – This is a key risk which cuts across the construction and operations phases. Security guards are in a position of power and can (and often do) abuse it. Using robust recruitment processes to select, train, manage and monitor security companies and their personnel is critical, as is having active community grievance/ whistleblowing mechanisms in place.⁵
- ! **Management of the supply chain** – Management systems to prevent SEAH issues at a project level need to be passed down the supply chain and, importantly, contractors must be held accountable for the monitoring and performance of their subcontractors.⁶

In thinking about how you identify, avoid, mitigate and manage SEAH risks in infrastructure projects, it is critical to take a holistic and context-specific approach, which considers SEAH risks in the context of the broader environmental and social safeguards.

³ Human Rights Watch (2014)

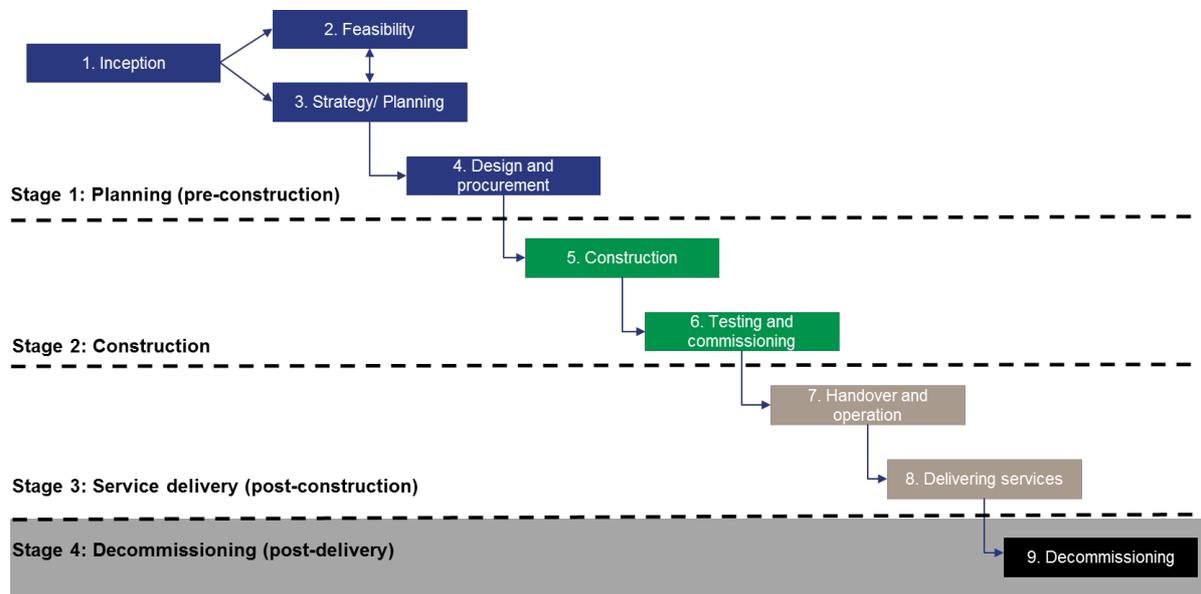
⁴ Finn (2008)

⁵ [Refer to World Bank E&S Framework ESS4 part B on Security Personnel for further detail on how risks should be managed.](#)

⁶ [Refer to World Bank E&S Framework ESS2 on Labour and Working Conditions for further guidance.](#)

Layout of the Tool

The tool is structured according to the eight key stages⁷ within the infrastructure project cycle as follows:



Under each stage, as the section heading, you will find:

1. *Description of key activities that take place at this stage of the project cycle.*
2. *Table with priority risks, proposed mitigation measures and opportunities to enhance benefits:*
 - **Priority SEAH Risks** – heightened or priority risks around SEAH that have a high likelihood of manifesting at this stage. These can include procedural risks in which steps are not taken to put in place measures to avoid/manage/mitigate SEAH risk downstream, and actual SEAH risks resulting from the implementation of the project at this stage.
 - **Mitigating Measures** – measures that should be in place to mitigate SEAH risks, preferably from the outset. DFID SROs/programme managers should ensure these are in place as part of the procurement process and during project mobilisation and should be monitoring the risks during implementation via regular reporting processes.
 - **Opportunities** – how activities relating to risk mitigation/response can be leveraged to enhance benefits and achieve a more positive development impact through the programme.
3. *Recommended actions to take in order to manage immediate and downstream risks.*
4. *Key questions to ask of partners (governments, multilaterals, donors, delivery partners, suppliers etc.) depending on the priority engagements at that stage.*

⁷ Note – in keeping with the Infrastructure Handbook (under development) this tool does not address the decommissioning stage.

The tool is accompanied by four case studies (Annex A – available upon request) using hypothetical SEAH-related scenarios on typical DFID programmes – these link back to the tool and can be used as workshop exercises for capacity building or training.

The literature on SEAH and infrastructure is limited. However, some relevant resources have recently been developed or are in the process of being developed by donors, multilaterals and the private sector. In this document you will find links to additional resources as follows:

- **Key resources on infrastructure and SEAH/gender-based violence/violence against women and girls** – both publicly available documents and those internal to DFID staff. Links to these can be found throughout the document and a list of key resources is included in *Annex B – Key Reference Material*.
- More **detailed guidance on specific aspects** of SEAH mitigation and management - e.g. how to design a robust reporting mechanism. Links and further information can be found throughout the document and in *Annex B – Key Reference Material* and *Annex C – List of Relevant DFID VAWG Helpdesk Queries*.
- **Upcoming resources** – relevant guidance being developed or currently being procured by DFID, other donors, multilaterals etc. These can be found in *Annex D – Upcoming Resources*.
- **Checklists and Quick Reference Material**. *Annex E – Monitoring Checklist* includes a practical checklist and guidance with questions and observation for testing both institutional and programme level safeguards is provided in Annex E. Any DFID staff member visiting the project site for any purpose can use this simple guidance to test institutional safeguards and monitor risks. *Annex F – SEAH Tool Summary Checklists* includes quick reference graphics summarising 1) recommended actions across the project life cycle and 2) priority risks to serve as a prompt when designing and reviewing projects.

2. SEAH in Infrastructure Tool

Stage 1: Inception

This stage involves establishing the need for an infrastructure intervention. The client (often a Government department, donor, multilateral organisation or trust fund) normally leads this process and DFID undertakes due diligence to inform its decision to fund or co-fund the project. As part of this, DFID needs to understand the potential environmental and social safeguards risks associated with the intervention, including those related to SEAH. This requires an understanding of the social context within which the intervention will be designed and delivered (e.g. prevalence of gender-based violence, relevant legislation or policy relating to abuse/violence, key vulnerable and/or marginalised groups). DFID also needs to determine the intervention's area of influence – this is determined not only by the immediate footprint of the project and facilities, but also by the surrounding land use and livelihood patterns of the men, women and youth neighbouring the project.

This stage may also include development of a Concept Note⁸ for the project, to be submitted to Ministers for approval. This establishes preliminary formal agreement before DFID proceeds with developing a full Business Case for the programme.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
<p>If on-the-ground consultation takes place, this would be carried out by DFID staff, partners or consultants. This raises risks of SEAH perpetrated by those undertaking consultations coming into contact with government personnel, NGO/civil society and members of the community.</p>	<p>Internal DFID security procedures conducted for all staff.</p> <p>Ensuring DFID staff understand and follow the updated Standards of Conduct and Behaviour.</p> <p>Safeguarding wording included in contracts with external consultants - and in Terms of Reference/ selection questions at procurement stage. This should reflect requirements set out in the 2018 Supply Partner Code of Conduct (Section 50 on Safeguarding).</p> <p>If consultants are appointed by a donor partner/ multilateral, DFID should ensure that these partners also perform the necessary screening/checks.</p>	<p>Start sensitising partners to establish a shared understanding of SEAH and inclusion principles and agree standards for the project.</p> <p>Raise awareness of SEAH-related policies, expected standards and reporting/feedback mechanisms to communities surrounding the project and ensure they understand their rights.</p> <p>Start scoping gender-based violence services/networks that could support downstream SEAH prevention and response.</p> <p>Start building the baseline data / knowledge of local SEAH issues and gender dynamics to establish a strong understanding of the local context.</p>

⁸ This refers to newly amended DFID procedures which allow teams to submit a much briefer Concept Note to ministers for approval before developing a full Business Case.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
<p>Where community-level consultation does not take place, there is a risk that the project does not sufficiently consider impacts to the community (positive and negative) at this early stage.</p>	<p>DFID to undertake a high-level assessment of the potential environmental and social contributions and risks the project would have, including a review of potential SEAH risks - e.g. via a high-level gender and inclusion assessment</p> <p>Concept Notes submitted for ministerial approval should make explicit reference to safeguarding against SEAH, demonstrating that potential SEAH risks and mitigation are being considered as early as possible.</p>	<p>Robust due diligence and understanding the development impacts at this stage puts DFID in a stronger negotiating position to demand higher safeguarding standards from partners from the outset.</p> <p>Opportunity to demonstrate better VfM (Efficiency, Effectiveness, Economy and Equity) as early planning prevents SEAH from occurring and saves costs relating to unforeseen response efforts downstream.</p> <p>Consider drawing on Social Development Adviser support at this stage to identify potential opportunities for project additionality (e.g. women-only carriages in a public transport project to reduce SEAH⁹). See here for further information.</p>

Recommended actions at Inception:

The main concern is that the wider SEAH risk environment is not properly considered at this early stage, and therefore the opportunity to plan appropriately from the outset is missed. The following actions can help ensure that SEAH risk is taken into consideration at this stage:

- ✓ Determine the area of influence by considering direct and indirect project impact.
- ✓ High-level assessment of the gender and inclusion contributions and risks that the project might have.¹⁰
- ✓ Policy and contextual review – of relevant legislation or policy at national and sub-national level – e.g. has the government signed up to the SDGs? Are there gaps in legislation around protection of vulnerable groups, rights etc?
- ✓ Understand the numbers and needs of vulnerable and/or marginalised people affected by the planned infrastructure – e.g. engagement with civil society, representative groups; desk-based (e.g. [Demographic and Health Surveys](#) datasets).
- ✓ Draw on in-house expertise (e.g. Social Development Advisers, [Safeguarding Unit](#)) and external networks for advice on SEAH risks in this particular context/sector.

⁹ [ICED Briefing Paper 'Violence against Women and Girls, Infrastructure and Cities' \(2017\)](#)

¹⁰ DFID VAWG Helpdesk query #170 on Prevalence, incidence and severity of SEAH – contact enquiries@vawghelpdesk.org.uk to access this document; see Annex C for further information.

Key questions at Inception Stage:

- For clients and partners - what are they already doing in the area of safeguarding against SEAH? What are their key concerns? What challenges have they faced in the particular sector affected by the project?
- For NGOs/civil society – questions to gain contextual information and baseline data on social norms, prevalence of violence, identification of vulnerable/at-risk groups.
- For DFID in-house colleagues – seek advice from colleagues with experience of the country context – e.g. do they have any concerns or recommendations in relation to the project, partners and/or wider risk environment?

Stage 2: Feasibility

This stage involves developing and defining the client's requirements and then identifying and appraising options for the development of a Business Case (potentially preceded by a Concept Note – see earlier section). This may require site investigations, collection of technical data, and understanding of beneficiary needs and should include consultation with potential beneficiaries. It should ideally be a joint process between DFID and the client (government, multilateral, donor, etc). DFID may engage consultants to support some activities in this stage. DFID will also conduct due diligence on potential delivery partners.

A detailed assessment of the project's environmental and social impacts should be undertaken at this stage and a robust plan for managing and monitoring these impacts will be produced. Typically, in infrastructure projects, these are referred to as the Environmental and Social Impact Assessment (ESIA)¹¹ and the Environmental and Social Management Plan (ESMP), respectively. Please note that different institutions use varying terminology so these may be referred to differently in your project.

The ESIA is about understanding the risks on the ground relating to the physical construction and operation of a project and findings feed into the ESMP. The ESMP is the critical tool for managing and monitoring these risks and impacts, positive and negative. It forms part of the tender documentation and so the selected supplier/implementing partner is then bound to deliver on the requirements set out in the ESMP. It is therefore critical that the ESIA considers the full scope of opportunities and SEAH risks, and that these are captured in the ESMP.

The ESIA should consider the various construction models that might be used as part of the project, and the risks and opportunities associated with each – e.g. labour-based works, semi-mechanised works, community construction schemes, etc. These should be clearly set out in the tender documentation.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
A number of different actors will be engaging with communities and stakeholders on the ground – risk that these personnel could perpetrate SEAH.	DFID to ensure that consultants/partners and organisations involved in consultations with stakeholders have undergone thorough due diligence checks and are aware of requirements	Start raising awareness among a wider set of stakeholders about the expected standards and behaviours with respect to SEAH (including the relevant policies/Codes of Conduct

¹¹ For more detailed guidance on the ESIA process see [EBRD ESIA Guidance](#).

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	<p>set out in the 2018 Supply Partner Code of Conduct (Section 50 on Safeguarding).</p> <p>Ensure partners are using appropriate and available tools for vetting and reference checking - e.g. DBS.</p>	<p>that they should have in place). This is particularly important if operating in a male-dominated environment/ industry or one where gender-based violence (GBV) or sexual harassment can be considered a norm.</p>
<p>Operational challenges to accessing women, children, the elderly and people with disabilities (e.g. due to mobility constraints and/or cultural norms) may prevent those most vulnerable to/at risk of SEAH from participating in consultations.</p>	<p>Specify in Terms of Reference/selection questions that consultants must demonstrate a proactive approach to deliberately accessing hard to reach populations (i.e. mobile operations, female staff, female-only safe spaces).</p> <p>Specify that consultants must report gender, age, ethnicity and disability disaggregated beneficiary research data as part of the scoping of potential E&S impacts. Baseline data collection needs to reflect the key issues identified in the Inception Stage.</p> <p>Ensure adequate female staff as part of the consultation team.¹²</p>	<p>Establishing a nuanced understanding/more robust data relating to the livelihood patterns and barriers to economic participation for hardest to reach groups at this early stage can help optimise benefits delivered by the infrastructure investment.</p> <p>Engaging at-risk groups at this stage presents an opportunity to sensitise them and make them aware of their rights and the reporting/feedback mechanisms that will be available to them.</p>
<p>Full scope of SEAH risks are not properly considered or picked up</p> <p>(Examples of risks, depending on the chosen construction model:</p> <p>If employing women in labour-based works (which is common practice) – risks relating to women working alongside men (e.g. in road building groups); lack of childcare options often leads to women bringing small children to the site or crèche facilities (risks around exposure of children to SEAH).</p>	<p>Terms of Reference for feasibility studies should explicitly require gender expertise as part of the team, reporting on assessing SEAH risks, key activities require consultation with and consulting women’s rights groups.</p> <p>Carry out scoping of potential SEAH risks as part of the ESIA scoping exercise.</p> <p>For projects where risks of SEAH are identified, carry out a proportional and commensurate assessment of these risks. This may be part</p>	<p>Early scoping of mitigation measures and mapping of GBV/survivor support services ensures a survivor-centred approach to prevention and response to SEAH from the outset.</p> <p>A realistic and comprehensive assessment of the risks is necessary to estimate potential costs of safeguarding against SEAH, so these can be incorporated into the project budget and design.</p> <p>Opportunity to increase development impact of the</p>

¹² Especially if operating in a gender segregated society and a culture that doesn't accept mixing between males and females - not having adequate female staff greatly impacts the ability to access women in the community.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
<p>Increased risk of SEAH if project is setting up construction camps/on-site accommodation for workers and families (e.g. industrial parks) – risks relating to women and children coming into close contact with workers (whether from within or outside community)</p> <p>Lack of accessible and safe facilities for women and peoples with disabilities working on site or as part of facilities management could expose vulnerable workers to SEAH risks (e.g. inadequate lighting, etc.).</p>	<p>of a Social Impact Assessment, or a stand-alone assessment. The team responsible should have appropriate expertise – e.g. in engaging and working with vulnerable groups in a cultural context similar to that of the project. The assessment should include consultation with affected groups.</p> <p>Engage/draw on local networks and representative groups, including those for survivors/GBV services, to help identify these risks.</p> <p>Ensure full scope of SEAH is covered as part of the ESIA when considering project options.¹³</p>	<p>project - e.g. how can the construction model support livelihoods and skills development/economic empowerment, as well as safety, of women or marginalised groups? What enabling policies and procedures can be built into the construction model – e.g. flexible hours, safe/secure provision of child care etc.?</p>

Recommended actions at Feasibility:

- ✓ Engage representative organisations as part of the consultation exercise. At a minimum, this should include women’s and children’s rights groups, indigenous people’s groups and disabled people’s organisations. Men and boys should also be represented in the consultation exercise.
- ✓ Map gender-based violence and other related support services in the area of influence to support prevention and response efforts downstream (i.e. referral pathways for survivors of SEAH).
- ✓ Ensure a focus on SEAH is explicit within all feasibility studies’ Terms of Reference and that data obtained through these studies is disaggregated by sex, age and disability at a minimum.

¹³ The Private Infrastructure Development Group (PIDG) has developed standard clauses for ESIA ToRs to ensure gender (including GBV) is properly considered in line with IFC Performance Standards. Please contact the DFID PIDG team to access this document.

Key Questions at Feasibility Stage:

- For clients and partners – what are their desired outcomes? What specific SEAH risks have they identified? Have a discussion to establish a shared understanding of key principles - what are their priorities on SEAH issues? What institutional safeguards do they have in place? How can they demonstrate these are functioning?
- For consultants engaged in scoping – how are they equipped to undertake sensitive research and scoping on SEAH issues? How are they approaching the exercise (team, methodology)? What institutional safeguards do they have in place? How can they demonstrate these are functioning well?
- For NGOs/local network partners – how would they define the focus of the scoping in relation to SEAH? How can you make most use of their contextual knowledge and include them in the process? What advice do they offer on taking a survivor-centred approach?

Stage 3: Strategy / Planning

This stage involves developing the detailed Business Case (or project design) and considering the programme's governance structure, approach to procurement, management of facilities, and risk management.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
Potential need to consult representatives of children and vulnerable people to optimise the delivery plan – staff/consultant exposure to vulnerable groups presents potential SEAH risk.	<p>DFID to ensure that consultants/partners and their organisations engaged for consultation activities have undergone thorough due diligence checks. and are aware of the requirements set out in the 2018 Supply Partner Code of Conduct (Section 50 on Safeguarding).</p> <p>Where children/vulnerable people need to be consulted, the need for specific expertise in this area should be included in Terms of Reference.</p>	<p>Raise awareness amongst communities/reinforce messaging around SEAH standards, expected behaviours and zero-tolerance policy, as well as feedback/reporting mechanisms.</p>
The Business Case does not sufficiently and explicitly consider SEAH risks and therefore the project is not set up in a way that can adequately prevent and respond to SEAH.	<p>SEAH should be integrated throughout the Business Case, including in programme governance, management and delivery (<i>see recommended actions below for more detail</i>)).</p>	<p>SEAH being properly integrated at Business Case stage (including the budget, if necessary) can provide flexibility to invest further resources in prevention and response at a later stage if required.</p>

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	<p>Use principles of adaptive programming to incorporate uncertainty into planning.</p> <p>Set out a detailed approach for how the project will address gender and inclusion (including safeguarding against SEAH) – plan now for Social Development Adviser QA/ review support (even if light touch and only at key review points).</p>	

Recommended actions at Strategy / Planning:

The detailed business case document should set out the following:

- ✓ How representatives of SEAH survivors, and related services (e.g. for gender-based violence), will be involved in the project governance structure. A senior safeguarding (SEAH) champion should be included in the top tier of the governance structure. This is important for demonstrating senior buy-in, accountability and setting an organisational culture around zero-tolerance for SEAH.
- ✓ Ensure that the project design considers potential SEAH risks, and that the preferred option includes considerations for mitigating these.
- ✓ Ensure activities and roles for SEAH risk mitigation and management are costed and budgeted as part of the project.
- ✓ Include explicit reference to requirements for expertise on SEAH prevention and response across the full procurement cycle (see next section for more detail), particularly if significant SEAH risks have been identified in earlier stages.
- ✓ Consider risk factors for SEAH related to the project facilities management planning (e.g. operations and maintenance plans/institutional arrangements/user fees), including facilities based in and around low-income housing or informal settlements, lighting and security along access routes, risks of corruption (pathway to SEAH), etc.
- ✓ Ensure the risk register clearly specifies potential SEAH risks, direct and indirect, and mitigation strategies. Consider breaking these down to identify specific risks at different stages of the project cycle, rather than a generic risk. Review these regularly.
- ✓ Ensure the proposed programme time schedule and reporting structure (indicative at this stage) set out key activities and requirements relating to SEAH prevention and response (e.g. consultations with at-risk groups, social impact assessments, etc).

Key questions at Strategy / Planning Stage:

- At this stage, the focus will be gaining information on the institutional side, in order to draw up budgets, risk management and management requirements etc.
- Ask implementing partners: What safeguarding standards and policies do they have in place? How will they ensure these are implemented internally and by their downstream partners? What is their oversight capacity and do they need any additional support? Do they have SEAH/gender-based violence specialists in house to identify and manage SEAH-specific risks?

Stage 4: Design and Procurement

This stage involves the detailed design of the project, the drafting of the tender documents, through to award of the construction contract.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
The project design is not optimised to identify, minimise or mitigate SEAH risks, meaning that some of these could go undetected.	Carry out the design and ESIA processes in parallel and mitigate some of the SEAH risks through improved design (e.g. gender-sensitive arrangements for construction worker accommodation).	Design that is informed by the ESIA process may enable the project to provide wider benefits to the community.
Construction downstream partners do not have appropriate management approaches and systems to manage SEAH.	<p>Ensure direct partners comply with the 2018 Supply Partner Code of Conduct (Section 50 on Safeguarding), and that they are aware of their responsibility in requiring the same standards from their own downstream partners. This could include providing training/capacity building to downstream partners, if needed.</p> <p>The procurement process should specify the management systems and approaches that the construction contractor will need to implement – (e.g. a Code of Behavioural Conduct for workers, whether they have a ‘closed’ construction camp (where workers are not allowed ‘out’ into the community), training and awareness campaigns for workers and for the community, grievance redress mechanisms, community outreach, etc..)</p> <p>A key element of management is an accessible complaint mechanism/Grievance Redress Mechanism (GRM), and the design and</p>	Ensuring expectations for management systems and approaches are in place during procurement and contracting will provide leverage down the line to hold suppliers to account.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	structure of this should be given consideration during the design phase.	
Tendering contractors and consultants do not have adequate ability to identify and mitigate SEAH risks across the programme delivery, management and monitoring	<p>Ensure procurement documentation (e.g. TORs and Terms of Reference/evaluation criteria include) includes specific requirements for managing, mitigating and responding to SEAH risks. Ensure there are clear requirements (including those relating to potential construction models).</p> <p>Include indicators relating to SEAH prevention and response within the logframe¹⁴ or Key Performance Indicators for suppliers.¹⁵</p>	<p>Clear articulation of requirements and expectations in the TORs and tender documentation gives DFID the leverage and opportunity to hold suppliers to account.</p> <p>The procurement process can be used for repeated messaging to the market/bidders on the expected standards for SEAH risk management – (e.g. during early market engagement, including questions in bidder presentations etc.).</p>
<p>Anticipated SEAH risks post-construction (i.e. during operation/delivery of services) are not explicitly captured in the ESMP or equivalent.</p> <p>(E.g. for a project that is building latrines in schools – must ensure that they are designed in a way that minimises risks for female users (separate facilities for boys and girls, adequate lighting, siting considerations etc.)</p>	<p>Ensure full scope of SEAH is covered as part of the social impact assessment, including for the downstream service delivery of the infrastructure.</p>	<p>Opportunity to ensure sustainable development impact and mitigation of SEAH risks beyond the DFID programme duration.</p>

Recommended actions at Design and Procurement:

- ✓ Ensure key tender documentation explicitly includes requirements on safeguarding against SEAH, including the capacity and skills of the delivery team, management arrangements and adequate budgets for prevention and response activities (survivor-centred).
- ✓ Agree Memorandum of Understanding (MOU) or other agreement with clients/partners that includes commitment to addressing SEAH.
- ✓ Ensure a comprehensive ESMP, or equivalent, is in place, which specifies SEAH risk management and monitoring requirements for all stages of the project.
- ✓ Ensure project design includes an accessible to all, multi-channelled complaints/grievance redress mechanism.

¹⁴ If draft logframe is provided with the tender documentation, ensure these considerations have been integrated. These should be proportionate to the risks identified.

¹⁵ These should be proportionate to the risks identified.

Key questions at Design and Procurement Stage:

- For potential contractors and consultants – What institutional measures do they have in place to prevent and monitor SEAH risks? How will they ensure a survivor-centred approach to managing SEAH risk? How will they manage and monitor any subcontractors or suppliers they intend to engage?
- For clients and partners– negotiation/discussion around wider benefits that could be brought about by the project (going beyond risk management to achieve additional positive development impact); structure the resulting MOU around this.
- Contractors, consultants and implementing partners – how can the programme go beyond a risk management approach to enhance benefits (e.g. safety of women/vulnerable groups)?
- Implementing partners and governments - how will monitoring of SEAH risk be undertaken? Who is responsible? Agree and capture this in the ESMP or equivalent.

Stage 5: Construction

In this stage, it is important to ensure that construction is carried out in accordance with the design, specification and contract documents, that there is compliance with the contractual arrangements and that any variations under the contract are dealt with professionally and, preferably, with the avoidance of dispute.

Construction projects, particularly of major infrastructure, represent high-risk environments for SEAH. This includes risks to workers and people in the local community in the project-affected area (around the construction site and associated facilities) as well as in the area of influence, such as those living along access routes used by the project or providing services to the construction camps (e.g. informal traders, potentially sex workers).

Monitoring and supervision should be given particular attention at this stage, as often safeguarding against SEAH is not integrated properly into construction activities. Project staff responsible for monitoring and supervision should be alert to wider risks such as corruption and health & safety,¹⁶ as these are early warning signals, or 'red flags' that indicate increased SEAH risks, particularly where contractors engage second-tier subcontractors and suppliers.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
An influx of workers can expose the community to risks of sexual exploitation and abuse. The scale of the influx and absorptive capacity of the community are factors to consider. ¹⁷	DFID should ensure that implementing partners have an accessible to all, multi-channeled complaint mechanism/ Grievance Redress Mechanism (GRM) in place for all project-affected persons to	Training on SEAH for the construction workforce (including HR and management, as well as construction workers) can be useful as a preventative and awareness-raising strategy.

¹⁶ See 'pathways to SEAH' on p. 5-6 of this document, on '**Key SEAH considerations for infrastructure projects.**'

¹⁷ Male worker influx can also affect power dynamics at the household level – men from outside the community interacting with women from the community can trigger male jealousy and result in increased domestic violence/intimate partner violence. See [WB Guidance Note on GBV in Civil Works for more detail.](#)

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
<p>Large construction projects which involve an influx of predominantly male workers into a community area can expose women and vulnerable groups living in the community and providing services (e.g. traders, sex workers) to risks of sexual exploitation and violence.¹⁸</p> <p>Large and more remote construction contracts will include women who travel to live in or around the camps, who are potentially highly vulnerable because of their lack of a local support network. See here for World Bank Good Practice Note.</p>	<p>report SEAH without fear of reprisals. There should be multiple channels and survivor information should be kept confidential and anonymous. There should be proactive and ongoing awareness raising of the reporting mechanism and how to access it.</p> <p>The investigation and response procedures¹⁹ following a report should be clear, and referral to essential services for survivors should be in place (e.g. GBV services, health services, psychosocial support, etc.).</p> <p>The implementing partner should conduct regular monitoring (including Third Party Monitoring) and reporting on SEAH through meaningful indicators. Stakeholder and community consultation should be ongoing. Ensure reporting mechanisms are working properly (a lack of reports indicates the system is not working, rather than there being an absence of incidents).²⁰</p> <p>Monitoring should include careful examination of the grievance redress mechanism to ensure it is functioning – is it being used (are there reports being made)? Are community and workers aware of it and comfortable/able to use it? What sorts of grievances are being raised? How are they being addressed? Are</p>	<p>Stakeholder and community consultations offer an avenue to repeat messaging around SEAH and raise awareness of expected standards, behaviours and feedback/reporting mechanisms.</p>

¹⁸ World Bank Group President Jim Yong Kim (October 2016) in [speech](#) launching GBV Task Force.

¹⁹ Upcoming World Bank resource on [standard procedures for investigating complaints of GBV/SEA](#) 2019.

²⁰ DFID VAWG Helpdesk query #207 on [Reporting and Complaints mechanisms](#) – contact enquiries@vawghelpdesk.org.uk to access this document.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	<p>workers' contracts linked to a Code of Conduct – i.e. is disciplinary action taken (see Annex E).</p> <p>Ensure key review points (e.g. DFID Annual Review) include specific monitoring of SEAH risks. Where possible, site visits to infrastructure projects should be incorporated into the Annual Review and this should include interviews of relevant stakeholders, such as construction workers or local communities (see Annex E for suggested questions to ask to determine/monitor SEAH risks). For particularly high-risk projects, consider more regular field visits, spot checks and/or procuring independent reviews.</p>	
<p>Access roads created by the project (e.g. for transportation of construction materials) may cut through established routes used by the community (e.g. schools/market routes). This could put children and vulnerable groups at risk, especially after dark and in remote areas.</p>	<p><i>In addition to the above (reporting mechanisms, monitoring and reporting, response protocols):</i></p> <p>Adequate security and safety measures should be provided, as required by the ESMP (e.g. security staff, pavements, fencing, and lighting on access routes).</p>	<p>Access routes could be planned in a way that creates benefits – e.g. provides formerly isolated community services (e.g. a health clinic) with safe access routes for local communities to use.</p>
<p>Illegal practices undertaken off-site and near communities (e.g. contracting staff using illegal borrow pits near to schools) can put villages/settlements at greater risk of SEAH.</p>	<p><i>In addition to the above (reporting mechanisms, monitoring and reporting, response protocols):</i></p> <p>Only contracts suppliers who have agreed to use aggregates from licensed quarries/mines.</p> <p>Contracts (header contract, employee contracts, etc.) include clauses prohibiting illegal practices and being specific about the perceived and actual risks associated</p>	<p>Training for contractor staff could include a component that explains the SEAH risks associated with illegal practices – can serve to raise awareness and understanding of required standards of behaviours and Codes of Conduct.</p>

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	with these (the 'why' as well as the 'what').	
<p>Sex work²¹ and increased use of drugs and alcohol²² are often associated with a mobile and temporary workforce, such as truckers and construction workers, which can further exacerbate the risk of SEAH.²³</p> <p>Often these activities are legal in the country of operation, and contractors use informal workers (no formal contracts) which present enforcement challenges.</p>	<p><i>In addition to the above (reporting mechanisms, monitoring and reporting, response protocols):</i></p> <p>All workers need to have a contract in place. Even if this is an extremely brief document, it is essential for preventing exploitation in general, and modern slavery (which are closely linked to SEAH risks).</p> <p>Build awareness of Codes of Conduct into contractor training. Include negative impacts of drug use, alcohol, prostitution, etc. as part of standard training. This can also be set out in the ESMP and places responsibility on the Contractor.</p>	<p>Training can offer positive messaging/benefits (see above).</p>
<p>Female (but also male) construction workers are vulnerable to sexual harassment and abuse, exacerbated by the traditionally male working environment. Under-reporting of men experiencing sexual harassment.</p>	<p><i>In addition to the above (reporting mechanisms, monitoring and reporting, response protocols):</i></p> <p>Require and incentivise partners to create and maintain a safe working environment for women construction workers, free from harassment and fear of violence. For example, CARE's EU-funded project '<i>Labour Rights for Female Construction Workers</i>' (2016-2018)²⁴ aims to address challenges faced by women working in Cambodia's construction industry. See here for further information.</p>	<p>While involving risks, construction projects can increase livelihoods opportunities for hard to reach/remote/marginalised groups in the project area. Income generating activities can serve to set precedents and change social norms around female participation in the labour force.</p>

²¹ Also increased risks of spread of HIV/AIDS.

²² Women and children are also at greater risk of domestic violence if men's increased income is spent on alcohol, drugs, or prostitution.

²³ [USAID \(2015\) Toolkit for Integrating GBV into Infrastructure Projects](#), Washington D.C.: USAID

²⁴ [Project Profile: 'Labour Rights for Female Construction Workers'](#)

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	<p>If workers are accommodated, the facilities that are provided need to consider a safe space for men and women – e.g. separate accommodation and wash facilities (see IFC/EBRD Guidelines on Workers' Accommodation).</p> <p>Workers grievance mechanisms are critical.</p>	
<p>Modern slavery and human and sex trafficking of men, women and children has been linked to the construction sector. SEAH can be perpetrated by employees in the project supply chain (e.g. truck drivers transporting aggregates) and can occur on routes and truck stops associated with a project, even if not on the project site itself. Links between child/bonded labour and construction are well documented.</p>	<p><i>In addition to the above (reporting mechanisms, monitoring and reporting, response protocols):</i></p> <p>Ensure direct partners understand that they are accountable for their subcontractors/suppliers – partners should pass down their own safeguarding requirements (including those in the 2018 Supply Partner Code of Conduct) to lower tiers and enforce them, through monitoring and penalties.</p> <p>Fair recruitment and building an anti-trafficking prevention component into project design can help reduce vulnerability to trafficking/sexual exploitation, abuse and harassment during construction.</p> <p>DFID/the implementing partner should engage with GBV services and local civil society organisations and NGO networks to get information and live reports of incidents or suspected trafficking.</p>	<p>Improvements to gender equality and social inclusion norms through fair recruitment practices can help to reduce risk of SEAH over the long term.</p>

Recommended actions at Construction:

- Ensure robust reporting mechanisms are in place for workers and all project-affected persons to report complaints – requires a clear and transparent investigation process that is survivor-centred; gender-based violence services/referral pathways set up.

- Integrate SEAH into worker and host community training (requirement for the Contractor).
- Monitoring actions for DFID staff – a practical checklist and guidance with questions and observation for testing both institutional and programme level safeguards is provided in Annex E. DFID staff members visiting the project site can use this simple guidance to test institutional safeguards and monitor risks.

Key questions at Construction Stage:

- Are there appropriate management systems and processes in place that reflect and are commensurate with the SEAH risks of the specific project? Is there evidence that these programmes are being implemented and if so, what do the results tell us – are they effective, are issues being raised and appropriately dealt with? The management programmes/plans are normally prepared by the contractor and set out, in detail, how they will manage the impacts and risks to the specific project.
- Ask the lead contractor – what specific SEAH risks have been identified and what mitigating measures are in place? How is the lead contractor managing the risks associated with its subcontractors and suppliers? Have any incidents been reported? (NB: In the case of an SEAH incident, partners are required to inform DFID immediately at reportingconcerns@dfid.gov.uk. DFID’s internal Safeguarding Investigations Team will then assess the situation and determine the appropriate response).
- In regular meetings with local networks (gender-based violence services, NGOs/CSOs) - ask questions that pick up on early warning signals (e.g. an increase in domestic disputes).

Stage 6: Testing and Commissioning

This stage involves testing the infrastructure to ensure it is functioning as intended, before commissioning. Who carries out the tests and signs off the infrastructure depends on the project – it can range from government engineers or a local contractor, to NGO staff or a DFID-appointed third party. Testing the infrastructure can be a lengthy and ongoing exercise, especially if the infrastructure involves complex electrical or mechanical equipment or computerised systems.

There is some overlap between this stage and the handover stage. For instance, the Operation and Maintenance (O&M) manuals are completed during commissioning and training of O&M staff should also take place prior to handover. Some of the priority risks considered for Stage 5: Construction and the recommended measures and actions will also apply at this stage.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
Risk that staff who come into contact with communities and vulnerable user groups may perpetrate SEAH. These could include staff testing the infrastructure over time and/or new staff	Ensure agreement is in place that new O&M staff must meet required standards set out by DFID and the client - (e.g. via the MOU) Safeguarding wording included in contracts with appointed consultants/third	Handover of manuals and training of O&M staff provide opportunity to influence behaviours and attitudes beyond time frame of DFID programmes.

<p>preparing for handover, operation and maintenance.</p>	<p>party and in Terms of Reference. If consultants are appointed by a donor partner/multilateral, DFID should ensure that these partners also perform the necessary screening/checks.</p> <p>Preparatory training for O&M staff could include a component on SEAH to help raise awareness and understanding of the risks and the required standards of behaviours and Codes of Conduct.</p>	
<p>Full scope of risks, including corruption during commissioning and sign off, are not properly considered or picked up – can lead to SEAH and sustained harmful impacts during operation and service delivery</p>	<p>Ensure the Environmental and Social Impact Assessment and Environmental and Social Management Plan flag specific risks for the testing and commissioning stage.</p>	<p>Opportunity to ensure longer-term, positive and sustainable impact and that the project does no harm.</p>

Recommended actions at Testing and Commissioning:

- ✓ Ensure full scope of SEAH risks are identified for the downstream stages; if the ESIA and ESMP have not properly considered these risks for later stages, these need to be identified (e.g. social assessment undertaken).
- ✓ Ensure regular monitoring and reporting procedures are agreed upfront as a key part of O&M; ensure these are explicit within the O&M manual and associated management plans.
- ✓ Leverage any opportunities to raise awareness of the required standards of behaviour and the potential implications of non-compliance – e.g. integrate into training to highlight SEAH risks and illustrate using examples such as the high-profile [World Bank Uganda Transport Sector Development Programme](#).

Key Questions at Testing and Commissioning Stage:

- For partners testing the infrastructure - What safeguarding standards and polices do they have in place? How will they ensure these are implemented? What is their oversight capacity and do they need any additional support? Do they have SEAH/gender specialists in house to identify and manage SEAH-specific risks?
- For O&M partners – what are the likely SEAH risks during operation and maintenance? How will these risks be prevented or managed? How will monitoring of these risks be undertaken? Who is responsible? What response procedures have they in place?

Stage 7: Handover and Operation

This stage involves the formal handover and transfer of the infrastructure by the contractor to the client. It is important to ensure that the client, or the operating entity, has the knowledge and capability to operate and maintain the facility. The risks at this stage and during delivery depend on the **type of infrastructure** being handed over.

Depending on the nature of the infrastructure project, a process of **community engagement or communication with the project beneficiaries** can be a vital part of the completion and handover process – especially for supply of services projects such as water and electricity. This may include the establishment of user committees and arrangements for collecting tariffs and other service or connection payments. For small projects, the facilities may also be handed over to the community to operate and maintain – ensuring their capacity and capability to take over the facility also applies here.

Risks during operation can be just as acute as during construction, depending on the size of the workforce and how they are accommodated; maintenance activities can be just as substantial as the construction phase. Certain groups of workers can be more vulnerable than others to SEAH risks – e.g. cleaners, catering teams, security teams and loan working teams.

The Environmental and Social Management Plan (ESMP) should have already picked up on the anticipated SEAH risks relating to project delivery and the likely operational model to be used. If this is not the case, it is extremely difficult to implement or demand additional SEAH mitigation or monitoring from the Operation & Maintenance (O&M) staff.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
Incoming O&M staff will interact with communities – risk that they may perpetrate SEAH	<p>Ensure agreement is in place that new O&M staff must meet required standards set out by DFID and the client (e.g. via the MOU)</p> <p>Provide training to O&M staff on preventing SEAH, including values/principles, risk mitigation, child safeguarding,²⁵ gender equality and inclusion; training should be passed through the delivery chain.²⁶</p> <p>O&M management systems to include requirements for regular reporting on environmental and social risks, including SEAH.</p>	Training offers an opportunity to engage new staff on SEAH issues and raise awareness of standards and expected behaviours.

²⁵ Keeping Children Safe Coalition provides online training and guidance on child safeguarding and many INGOs are partners to the initiative: <https://www.keepingchildrensafe.org.uk/>

²⁶ Training highlights that mandatory reporting, where legal systems are weak and may well do harm, is not the priority. Instead following a survivor-centered approach for adolescent girls and women to ensure they have the choice to access health and psychosocial support services from GBV actors in female only spaces is a priority. For child survivors of SEAH, supporting access for children and their caregivers to child protection response services is prioritised. Link implementing partners with GBV and Child Protection experts in the location or region to facilitate access to available services.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	<p>Ensure an effective worker and community grievance mechanism is in place and raise awareness of the mechanism.</p> <p>If there is a workforce, ensure a Worker Code of Behavioural Conduct is in place and link this to employment and procurement contracts.</p> <p><i>Note: If O&M is contracted out – same process as during procurement stage needs to be followed.</i></p>	
<p>Monitoring activities do not continue to put a focus on SEAH</p>	<p>Ensure that management programmes are in place, and implemented, that reflect the risks identified for the O&M phase. These management programmes should set out SEAH monitoring requirements with meaningful indicators.</p> <p>Consider provision of necessary technical assistance to the relevant government authority to ensure SEAH focus is maintained.</p>	<p>Provision of longer-term technical assistance can build capacity of implementing authorities to prevent SEAH, while also helping to change attitudes of authority staff and organisational culture.</p>

Recommended actions at Handover and Operation:

- ✓ If not sufficiently covered in the ESMP or equivalent, consider the potential for additional monitoring to review and capture SEAH impact and outcomes during handover.
- ✓ Provision of technical assistance to the relevant government authority to ensure SEAH focus is maintained.
- ✓ If ESMP has not sufficiently covered required standards and capacity of O&M staff, consider linking with other DFID (or external) programmes in the project area to leverage support to monitor downstream SEAH impacts - e.g. use of their reporting systems, awareness raising/community outreach activities, etc.
- ✓ Raise awareness of complaints and grievance mechanisms with communities in the area of influence during handover consultations.

Key Questions at Handover and Operation Stage:

- What specific support does the O&M staff need – e.g. monitoring, training? Technical assistance can be designed around this. What management systems does the operator have in place to manage SEAH risks during operations and maintenance – e.g. associated with its staff, its supply routes and mechanisms, its procurement and management of contractors and subcontractors, its engagement of security personnel etc.
- Questions to the community on concerns and outstanding issues – engage representative organisations and local networks (NGOs, civil society women’s groups disabled peoples’ organisations) to obtain information via formal and informal channels.
- Ensure that the community are aware of available support services in the local area and know where to go in the case of any future SEAH concerns or incidents.

Stage 8: Delivery of Services

The construction phase usually provides some development impact in terms of short-term jobs, training and income through supply of materials and equipment. Yet it is once the project is completed, handed over and in operation that the planned outputs and outcomes from the project should start to be realised.

At this stage DFID has very limited influence over activities on the ground. It is essential therefore, that the SEAH risks during delivery are considered earlier and mitigation, prevention and response measures are articulated in formal agreements and documentation.

While DFID may offer long-term monitoring support at this stage, it is likely to be for technical service delivery oversight rather than for SEAH-specific support. In terms of SEAH, the legacy of what has been implemented in upfront stages will manifest during service delivery.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
Project inadvertently contributes to SEAH or creates further exclusion, segregation and/or inequality	Ensure that the wider risk environment relating to SEAH has been properly addressed in the earlier social impact assessment and that mitigation measures have been built in and implemented throughout the project cycle.	To ensure long-term, sustainable development impact of the project and ensure that the project does no harm.
Service delivery staff engaging with users (e.g. tariff collection) and communities (e.g. routine monitoring staff) in the project area perpetrate SEAH	Ensure that the service delivery partner is required to have strong institutional safeguards in place, especially for staff recruitment, induction and training, as part of the	Opportunity for DFID to cascade its own due diligence and safeguarding principles throughout the supply chain.

Priority SEAH Risk	Potential Mitigation Measures	Opportunities
	ESMP. Technical assistance at Operation & Handover stage can further support capacity in these areas.	
Marginalised and vulnerable groups employed for long-term maintenance work experience SEAH in the workplace	Ensure you have left the project with a safe and fair employment environment as part of the ESMP requirements, MOUs and technical assistance/ training during Handover and Operation.	Maintenance jobs offer a longer term, decent and more secure livelihood opportunity. Ensuring these are also safe, quality jobs, in an environment free of SEAH, enhances overall programme benefits.

Recommended actions for Delivery of Services:

- ✓ Leverage formal agreements and key documentation from earlier stages of the project to maintain SEAH focus for the duration of project delivery.
- ✓ Share lessons learned on avoidance, mitigation and management of SEAH risk and response to DFID colleagues working on infrastructure, to increase institutional knowledge.
- ✓ Include monitoring of SEAH as part of any future independent evaluation of the project (if one takes place).
- ✓ Any downstream provision of technical assistance/training to include consideration of SEAH

Key Questions for Delivery of Services Stage:

- Check in on progress/impacts of the project through active donor or government working groups (not project specific).
- Liaise with NGOs and local networks on impacts and reports – preferably quarterly.
- Keep up to date with wider risk environment factors through country office colleagues.

ANNEXES

Annex A: Case Studies

*Sensitive * – these documents are for internal DFID use only. They can be found at the following [Vault](#) link.

Contact the DFID Safeguarding Unit (k-eeuwens@dfid.gov.uk) if you have any trouble accessing the case study materials.

Annex B: Key Reference Material

EBRD/IFC (2018) [Good Practice Note: Managing Risks Associated with Modern Slavery](#)

DFAT (2017) [Child Protection Guidance Note: Infrastructure Activities](#)

DFAT/Private Infrastructure Development Group (2016) [Gender Equality Advisory Services for Infrastructure Programs](#)

Finn, D (2008) [‘Bonded Labour in India’ in Human Rights and Contemporary Slavery](#)

Fraser, Viswanath and MacLean (2017) [ICED Briefing Paper: Violence against Women and Girls, Infrastructure and Cities](#)

Human Rights Watch (2014) [World Report 2014: Qatar](#)

ICAI (2018) [Review of DFID’s Transport and Urban Infrastructure Investments](#)

IFC (2017) [Good Practice: Note Managing Contractors’ Environmental and Social Performance](#)

IFC/EBRD (2009) [Guidance Note: Workers’ Accommodation: processes and standards](#)

World Bank (2018) [Good Practice Note: Addressing GBV in Major Civil Works](#)

World Bank Task Force (2017) [Working together to prevent sexual exploitation and abuse : recommendations for World Bank investment projects](#)

World Bank (2018) [VAWG Resource Guide](#)

World Bank (2016) [Managing the Risks of Adverse Impacts on Communities from Temporary Project Induced Labor Influx](#). *Not publicly available – DFID to request from WB*

UN/DFID/FCO (2018) [SEA risk toolkit](#)

USAID (2018) [Advancing Gender In The Environment: Making The Case For Gender Equality In Large-Scale Renewable Energy Infrastructure Development](#)

USAID (2015) [Toolkit for integrating GBV measures into energy and infrastructure projects](#)

Commitment statements following the October 2018 Safeguarding Summit:

- [Donor commitments](#) - including a commitment to support the OECD Development Assistance Committee (DAC) to formulate a new DAC instrument that in 2019 will set standards on preventing and managing the risks of sexual exploitation and abuse in development cooperation, and drive donor accountability in meeting them.
- [IFI commitments - Update on the Joint Statement on Continuous Advancement of Standards to Prevent Sexual Harassment, Abuse, and Exploitation](#).
- [CDC commitments](#) - including commitments to develop safeguarding guidance, in conjunction with IFC and EBRD, to promote better practices in the markets and geographies where CDC operates.

Annex C: List of Relevant DFID VAWG Helpdesk Queries

Query #	Safeguarding advice provided by the VAWG Helpdesk (For more info contact enquiries@vawghelpdesk.org.uk)
164	Global safeguarding standards and initiatives mapping Maps existing global safeguarding standards and initiatives, clarifying whether they specifically consider sexual exploitation and abuse, what broader safeguarding issues are considered, and (if possible) any information about how many people have signed up/abide by them.
165	Organisational Approaches to Safeguarding – effectiveness of different approaches.
168	Whistleblowing best practice Maps the evidence of the effectiveness of different whistleblowing approaches to allow beneficiaries, staff and others to report sexual exploitation and abuse. Compares arms-length, in-house and other approaches, and summarises best practice on what works and why.
170	Prevalence, incidence and severity of sexual exploitation and abuse
172	Evidence of current practice and experience within the UK humanitarian/development aid sector. Assesses the role organisational culture plays in creating an enabling environment for, or failing to prevent and respond to, sexual exploitation, abuse and sexual harassment.
173	Lessons from other sectors/disciplines about what represents effective best practice in organisational culture to address sexual exploitation, abuse and harassment.
176	Reviews current practice among INGOs and domestic UK charities in reporting safeguarding processes, breaches and concerns related to sexual exploitation, abuse and sexual harassment in their Annual Reports (e.g. do they publish the number of cases per year?) Identifies good practice (defined as open and transparent reporting).
185	Advice on potential suppliers supporting child and adult safeguarding
200	Maps best practice guidance around what support should be provided to survivors of gender-based violence (GBV) – e.g. whether particular guidance is considered most authoritative/best practice; commonalities, gaps and overlaps; whether there should be any additional considerations for victims/survivors of sexual exploitation, abuse and harassment as opposed to other types of GBV.
207	Map what has been done (a literature review) on i) reporting/complaints mechanisms, ii) barriers to reporting , and iii) victim/survivor support in the aid sector for SEAH survivors/victims
220	Organisational approaches to prevent sexual harassment
231	Dormitories in Ethiopia – evidenc on international best practice on how to design and manage safe accommodation for housing women workers.

Annex D: Upcoming Resources

World Bank – Development of Standard Investigation Procedures

The World Bank is procuring a third party (consultant) to support World Bank-funded programmes to establish quality procedures to enable accountability around sexual exploitation, abuse and harassment, including reporting, investigation, redress and disciplinary action.

The consultant will, in the first phase of this consultancy, develop guidance for and test an accountability framework specifically tailored to the needs of the *Fonds Social de la RDC*, which is responsible for implementing a range of human development projects in the DRC. Simultaneously, the consultant will develop guidance for and test similar frameworks that address the needs of clients implementing large infrastructure programmes through contractors, with the Mwache Multipurpose Dam in South East Kenya being the test case.

Timeline: End March - October 2019

Status: [Procurement underway \(proposal stage\)](#)

Joint EBRD, IFC and CDC Group – Addressing Gender-Based Violence Risks in Investments – Good Practice Note for the Private Sector

EBRD, IFC and CDC are developing a Good Practice Note on safeguarding/gender-based violence for companies and investors operating in developing countries, so as to: (i) improve the understanding and identification of risk factors for gender-based violence (GBV) and sexual exploitation, abuse and harassment in different sectors (including infrastructure); (ii) provide tools to assess whether an investment/company's activities are likely to exacerbate existing risks or create new sets of risks; (iii) reduce risks of, and prevent, gender-based violence and sexual exploitation, abuse and harassment; and (iv) ensure appropriate and effective responses.

Timeline: March 2019 – February 2020

Status: In delivery

Service Provider: Social Development Direct Ltd

DFID Resource and Support Hub for safeguarding against sexual exploitation, abuse and harassment

DFID is developing a Resource and Support Hub for tackling sexual exploitation, abuse and sexual harassment (SEAH) in the aid sector. The Hub will support organisations (particularly smaller NGOs/civil society organisations, but also others) to implement best practice on safeguarding against SEAH, including improved mechanisms for beneficiary feedback and accountability.

Timeline: Expected to go live in October 2019

Status: [Prior Information Notice \(PIN\)](#)

Annex E: Monitoring Checklist

Monitoring institutional safeguarding against sexual exploitation, abuse and harassment (SEAH)

First, clarify what are you monitoring/what minimum standards are you expecting. Think about different partners/contractors and areas or regions where the project is operating. Just because a safeguarding policy is implemented in one area, or by one partner, does not mean it is functioning in another.

Also, just because one group of employees is knowledgeable does not mean all staff are, so try to speak to staff in different job roles if you can. Also, note whether the people you speak to sound confident or not when they speak about safeguarding against sexual exploitation, abuse and harassment. The point of this checklist is to help you think systematically about whether you think there really is a *culture of safeguarding* going through the whole project/office.

Observation:

- How are you treated as a visitor/person of power? Are you briefed on the safeguarding procedures and what is expected of you? Are you put in any situations where misconduct could occur?
- When visiting offices/project sites do you see a copy of the safeguarding policy/reporting mechanism? Is it accessible for staff/beneficiaries to report a concern? Does relevant project material include information about how to report incidents of sexual exploitation, abuse and harassment?

Testing knowledge:

- Do all staff/volunteers/contractors know what the safeguarding procedures are? Do they know what is in their Code of Conduct? Can they tell you how to report a complaint? Do they sound confident outlining what they would do in different scenarios (e.g. involving a project staff member, a service user, sexual harassment, etc)?
- Ask different individuals when they last received training on safeguarding against sexual exploitation, abuse and harassment. How frequently do staff have training?
- Ask service users and local stakeholders if they know about the reporting/grievance mechanism. What do they know about this? Do they feel it is accessible? What do they say they can report through this? Note whether they ever mention sexual exploitation, abuse or harassment, or other types of misconduct.

Responding to concerns:

- How are cases/concerns logged and tracked? Is information kept confidential? How are lessons learned about them?
- Are relevant individuals (safeguarding focal person, programme director, etc) able to explain what the procedures are for different types of SEAH cases (e.g. sexual exploitation involving children, sexual harassment in the workplace, etc)?
- Ask local stakeholders (if appropriate) if they have ever reported a concern and, if so, how was this responded to. Be mindful of who you ask this question to, in what context you are asking it and what types of concerns they may feel able to talk about.

Processes:

- How do they monitor and test that their own systems are working? Remember it is not enough for there to be a reporting/grievance mechanism. People need to know about these mechanisms and be able to access them. An absence of reports does not equal an absence of concerns/misconduct.

Project monitoring in relation to SEAH

This checklist is designed to be broad in order to apply to different types of monitoring visits that DFID may carry out. Some of these questions might go beyond what you can do in each visit and we would expect that some questions for communities may not be appropriate, depending on the nature of the visit.

While conducting the visit, reflect on:

- Do you feel like partners have identified the correct risks for the individuals involved and mitigated these through programme design and implementation?
- Are SEAH risks appropriately considered in monitoring and evaluation (M&E)?
- Has the programme put in place sufficient monitoring mechanisms to identify early warning signs when it comes to unintended harm (for example increases in domestic violence)?
- Do SEAH resources appear appropriate for the programme? Are relevant staff suitably skilled and trained?

Observation:

- Do staff/service providers keep sensitive information about SEAH confidential or are they sharing too much information with you? Alternatively, do they seem to be withholding information (e.g. claiming that there are no cases, when this seems unlikely)?
- Do you see referral paths and reporting mechanisms being highlighted in any project materials? Are these materials accessible to women in the communities the programme has contact with?

Service provider/project:

- Do the relevant staff/volunteers/contractors know what the procedures are for referrals (e.g. to support services for survivors of SEAH)? Can they tell you how different reports of SEAH may be dealt with differently? For example, do they sound confident outlining what they would do in different scenarios (involving project staff member, a service user, sexual harassment case, etc)?
- Ask about how different individuals (for example adolescent girls or people living with disabilities) may be impacted by SEAH and how they can access relevant services and support through the programme? Are there services available to cater for their different needs?
- Ask to see any service mapping that the project has done. Does it clearly identify relevant organisations and services in the areas they operate? If there are gaps, ask how the project has adapted accordingly.
- Are services quality assured? Could there be additional risks for survivors by being referred to these services?
- How is the project monitoring SEAH and any adverse impacts on women participants? What early warning signs are they looking out for?

Communities and service users:

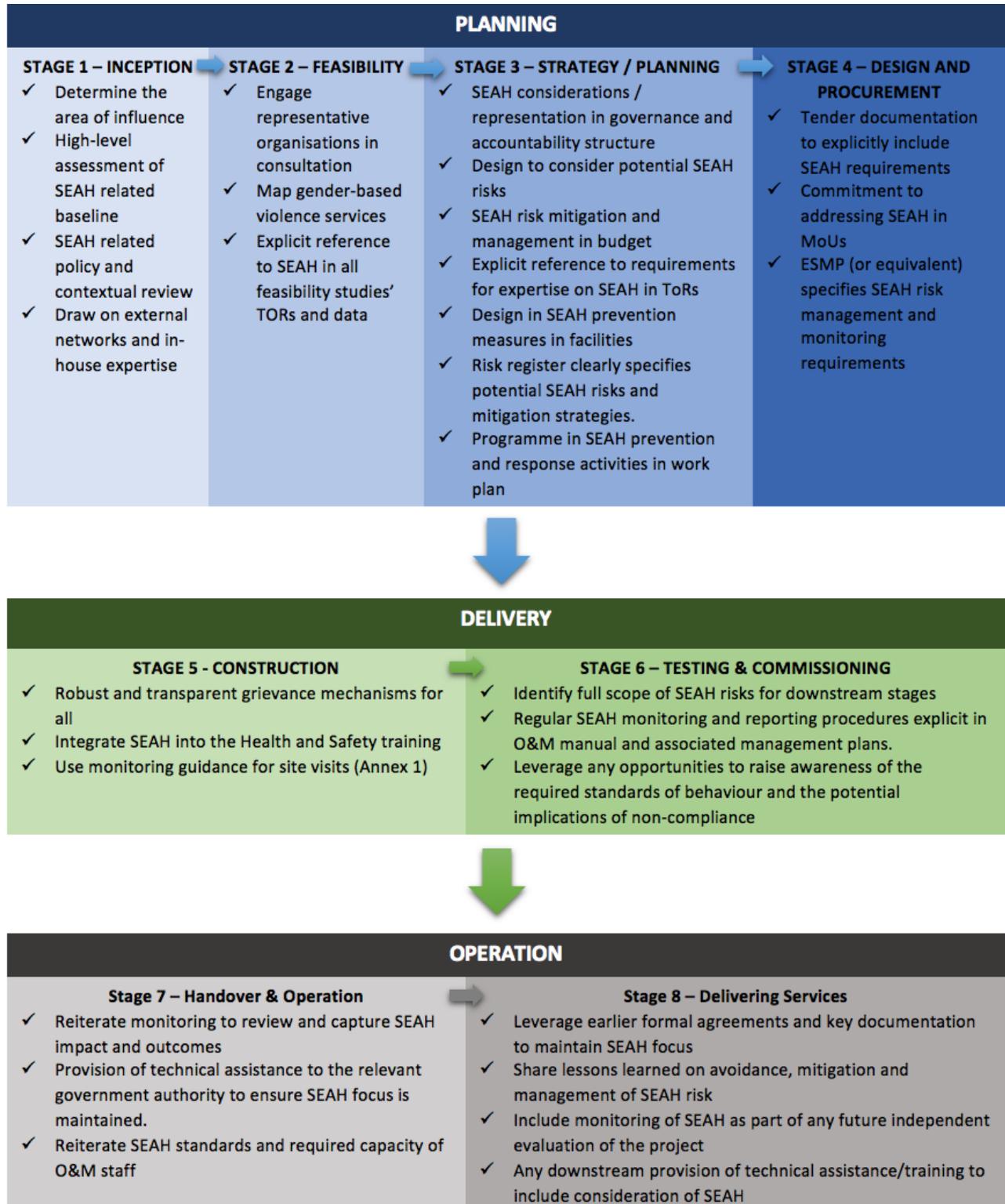
Any time you ask questions related to sexual exploitation, abuse and harassment, be mindful of whether there are any risks involved for the respondent. For example, be mindful of who might overhear you, how you ask the question (never ask about someone's personal experience and be mindful of the words that you use). The safety of women and children must always be the priority over monitoring, and it is important to take care not to re-traumatise any potential victims/survivors of SEAH. Also, be prepared for people to make disclosures to you during these

conversations and make sure you know what to do in such an instance (these should be reported to DFID's reportingconcerns@dfid.gov.uk hotline. DFID's internal Safeguarding Investigations Team will then assess the situation and determine the appropriate response).

- E.g. If appropriate, ask local stakeholders (and possibly service users) what they would encourage a neighbour/friend who experienced SEAH to do. Note whether they mention using the referral mechanism that has been put in place by the project.
- Ask women and service providers if they know where the local gender-based violence or SEAH-related support service provider is.

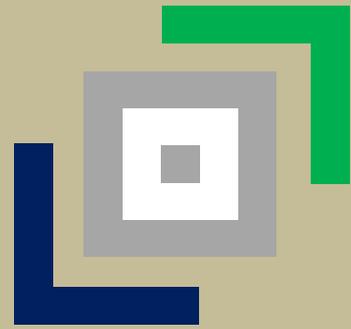
Annex F: SEAH Tool Summary Checklists – Recommended Actions and Priority Risks

Checklist of **Recommended Actions** at each stage of the project life cycle:



Checklist of **Priority Risks** at each stage of the project life cycle:

Project Cycle Stage	Priority Risks
1. Inception	<ul style="list-style-type: none"> • SEAH perpetrated by staff undertaking consultations • Project does not sufficiently consider community impacts
2. Feasibility	<ul style="list-style-type: none"> • Multiple personnel engaging with community • Accessing hard to reach groups • Full scope of SEAH risks not properly scoped
3. Strategy/ Planning	<ul style="list-style-type: none"> • Engagement with children and vulnerable persons • SEAH not explicit in Business Case
4. Design and Procurement	<ul style="list-style-type: none"> • Construction models e.g. labour-based works • Bidders demonstrate weak capacity • Operation and maintenance risks not explicit in risk management plan
5. Construction	<ul style="list-style-type: none"> • Worker influx – scale and absorptive capacity • Transport/project access routes • Illegal practices e.g. borrow pits • Mobile, temporary or informal workers • Sexual harassment (male and female) on site • Supply chain – bonded/forced labour, trafficking
6. Testing and Commissioning	<ul style="list-style-type: none"> • New personnel in contact with community • Corruption risks – pathway to SEAH
7. Handover and Operation	<ul style="list-style-type: none"> • Operation and Maintenance staff perpetrating SEAH in community • Monitoring activities do not continue focus on SEAH
8. Delivering Services	<ul style="list-style-type: none"> • Project creates further inequality/exclusion • Service delivery staff (tariff collection) perpetrate SEAH • Maintenance staff experience sexual harassment in the workplace



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