



# Final Report

## **“Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Risk Assessment and Mitigation Action Plan”**



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## LIST OF ACRONYMS

❖ ARC	Arazi Record Centre
❖ ADCR	Additional Deputy Commissioner Revenue
❖ ADLG	Assistant Director Local Government
❖ BOR	Board of Revenue
❖ CEDAW	Convention for Elimination of all Forms of Discrimination Against Women

❖	COC	Code of Conduct
❖	CSOs	Civil Society Organizations
❖	DasDevelopment	Alternatives
❖	DDLG	Deputy Director Local Government
❖	DLG	Director Local Government
❖	DGKA	Directorate General of Katchi Abadis
❖	DRM	Disaster Risk Management
❖	ESCP	Environment and Social Commitment Plan
❖	ESIRT	Environment and Social Incident Reporting Toolkit
❖	ESS	Environment and Social Standards
❖	ESMF	Environment and Social Management Framework
❖	FGDs	Focus Group Discussions
❖	FRC	Family Registration Certificate
❖	GBV	Gender-Based Violence
❖	GBVCC	Gender Based Violence Complaint Committee
❖	GS	Gender Specialist
❖	GoP	Government of Pakistan
❖	GRCs	Grievance Redressal Committees
❖	GBVCC	Gender Based Violence Complaint Committee
❖	GRM	Grievance Redressal Mechanism
❖	IDA	International Development Assistance
❖	IP	Implementing Partner
❖	KIIs	Key Informant Interviews
❖	LGCD	Local Government and Community Development
❖	LRMIS	Land Records Management and Information System
❖	MDA	Multan Development Authority
❖	NADRA	National Database and Registration Authority
❖	NCSW	National Commission on Status of Women
❖	PDHS	Pakistan Demographic and Health Survey 2017-2018
❖	PHATA	Punjab Housing and Town Planning Agency
❖	PIU	Project Implementation Units
❖	PLRA	Punjab Land Records Authority
❖	PMU	Project Management Unit
❖	PPC	Pakistan Panel Code
❖	PULSE	Punjab Urban Land System Enhancement
❖	RDA	Rawalpindi Development Authority
❖	RoD	Registration of Deeds
❖	SDG	Sustainable Development Goals
❖	SEA	Sexual Exploitation and Abuse
❖	SH	Sexual Harassment
❖	SOPs	Standard Operations procedures
❖	TORs	Terms of Reference
❖	UC	Union Council
❖	UNSCR	United Nations Security Council Resolution
❖	VAW	Violence Against Women
❖	VAWC	Violence Against Women Centre
❖	WB	World Bank

- ❖ WB GPN World Bank Good Practices Note 2020
- ❖ WESW Women Economic and Social Wellbeing
- ❖ WPRCs Women Protection and Rehabilitation Centers

## Executive Summary

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The Government of Punjab, in collaboration with the World Bank, is implementing the Punjab Urban Land Systems Enhancement (PULSE) Project to improve land records and identify land for development, including land for housing programs. The project aims to achieve: (a) the provision of digital land records linked to cadastral maps; (b) improved tenure security and access to land for housing; (c) a unified modern land information system; and (d) a strengthened capacity and regulatory framework. The people in Punjab, particularly women and vulnerable groups, are expected to benefit from the increased security of land rights and property ownership.

The purpose of this GBV/SEA/SH Risk Assessment and Mitigation Action Plan is to assess, the risks of Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) which may arise because of project activities and propose measures to prevent, manage and prevent such risks. It provides an assessment of the capacity of the Project Management Unit (PMU)/ Board of Revenue and Project Implementation Unit (PIU)/ Punjab Land Records Authority(PLRA), Contractors, Surveyors, Implementing Partners (IPs)/ Consultant and beneficiaries and proposes an effective GBV/SEA/SH Grievance Redress Mechanism (GRM) (as part of the main GRM) with multiple access options, trained staff, and specific protocols handling GBV/SEA/SH complaints so the right action is triggered under the project. TORs of the assignment are provided in Annex-11.

In this context, the Development Alternatives (DAs Consultant) is assigned to undertake risk and capacity assessment prepare an integrated GBV/SEA/SH risks mitigation plan and organize GBV/SEA/SH prevention/ awareness training sessions together with the development of required protocols.

The DAs used a mixed method of data collection and analysis including information from both primary and secondary sources related to the PULSE Project and to conduct risk assessment and analysis to make recommendations for the project. Based on the World Bank's Environment and Social Commitment Plan (ESCP) and Environment and Social Management Framework (ESMF), which were used as guiding documents, this report is an outcome of detailed consultation and deliberation with key stakeholders. The report is focused on: (a) the Identification of GBV/SEA/SH risks arising from project activities, (b) the assessment of training needs assessment of PMU and other implementing partners, and (c) the development of a consolidated mitigation/ response plan as well as the key contents of training. In this process, besides a thorough desk review of relevant documents, Key Informant Interviews (KIIs) and Focus Group Discussions (FDGs) were organized in nine (09) prioritized districts in consultation with the PMU team. Key stakeholders, such as PMU and PIU, Implementing partners (contractors), Ombudsperson of Punjab, Directorate of Katchi Abadis, Women Development Department, Social Welfare Department, Police Department, Local Government and Community Development (LG&CD) District Administration, Land Revenue Department, Arazi Record Centers, Local Community Based Organizations (CBOs) project beneficiaries, especially women and other vulnerable groups and service providers to survivors at district level were consulted.

The overall risk and capacity assessment suggests that GBV/SEA/SH-related risks can affect women and other vulnerable groups across all demographic settings/districts during the implementation of project initiatives in the field. The groups often identified as being at the highest risk and vulnerable for GBV/SEA/SH include women workers, direct workers, contracted workers, community workers, and direct project staff. The potential GBV/SEA/SH risks to women adolescent girls, the elderly, Persons with Disability (PWDs), minorities, transgender persons, and other disadvantaged groups of communities in the project areas because of the influx of surveyors, contracted workers, and revenue staff under the project were also assessed. Furthermore, there are risks of GBV/SEA/SH to beneficiary women from family and male community members on issues arising due to the involvement of women

in surveys on land/property ownership. All above-mentioned categories of women and marginalized groups are being least able to access support and protection mechanisms with regard to GBV/SEA/SH risks.

Under the PULSE project, survey work will be executed by contractors. With varied cultural and economic backgrounds, the likely interactions between communities and workers may lead to potential safety issues, particularly for women/ children, making it pertinent to create awareness of GBV/SEA/SH and risk mitigation. If not carefully managed, an influx of surveyors and contracted workers can negatively impact a project area, especially in a context with a high prevalence of violence against women and girls. The assessment recommends that strong measures be prepared and implemented to address the risks of GBV/SEA/SH in adjacent/surrounding communities, especially women, the elderly, PWDs transgender persons, and minorities. It is therefore essential to create awareness amongst survey/social mobilizers and the community to prevent these risks and respond to them through an effective mitigation action plan.

Based on the risk assessment, the component-wise Mitigation Action Plan (MAP) has been developed. MAP identifies the GBV/SEA/SH risks, mitigation measures stakeholders, possible service providers and assesses their capacity, and document the legal and institutional mechanisms that aid in accessing grievance redressal. The components for a robust and timebound response plan with designated responsibilities include: mapping of GBV/SEA/SH service providers, training of project and contractors/IPs on GBV/SEA/SH, community awareness sessions/ initiatives/ display of signages and inclusion of GBV/SEA/SH in staff safety induction, signing of code of conduct, enforcement of accountability framework, effective SEA/SH Grievance Redress Mechanism (GRM) model (as part of the main GRM), and monitoring & evaluation including re-assessment of risks as and when required throughout the project life. The plan also proposes the strengthening of institutional linkages with other relevant departments such as Ombudsperson-Punjab, Police Department, Violence Against Women Centers (VAWC) working under the Social Welfare Department, local NGOs/CBOs, and response actors for GBV/SEA/SH risk mitigation.

Although there is ample knowledge and understanding of the technical aspects of the project including the gender mainstreaming and actions, there is a lack of conceptual clarity about the GBV/SEA/SH related risks, response, and prevention measures at PMU/PIU, Contractors, IPs, and Consultants hired under the project for different activities. Considering the limited awareness about national policies on GBV/SEA/SH, it is recommended to have specialized/ tailored and regular training programs and awareness sessions, as well as provision of knowledge management products around GBV/SEA/SA. Customized training contents are proposed together with orientation and awareness sessions for the project staff, GRM specialists, contractors/surveyors, IPs, and beneficiaries/ communities.

While addressing GBV/SEA/SH risks, it was observed that the PULSE project GRM was partially in place under the project to cater to the related complaints of GBV/SEA/SH risks. Therefore, protocol and channels have been outlined to handle GBV/SEA/SH complaints in a survivors centered manner under the PULSE project. The protocols, SOPs, and GBV/SEA/SH grievances redressal committee, namely the Gender-Based Violence Complaint Committee (GBVCC), needs to address complaints related to GBV/SEA/SH. For the complaint and reporting mechanisms being operated by IPs/Consultants as internal mechanisms, it is suggested that any complaint system operated by contractors or Consultants /IPs should include processes to refer complaints toward the PULSE GRM to ensure an accurate understanding of the project complaints is always available and can be monitored and tracked.

Based on Key findings, a Mitigation Action Plan has been devised for expected GBV/SEA/SH risks and proposed mitigation measures, stakeholders, and possible service providers. The report covers the assessment of key stakeholders' capacity and the legal and institutional mechanisms that aid in accessing grievance redressal. The components for a robust and timebound response plan with



designated responsibilities are prepared along with the Responsibility, Accountability, and Response Framework and monitoring & evaluation including re-assessment of risks as and when required throughout the project life. The GBV/SEA/SH risks and capacity assessment key findings also include strengthening the capacity of staff i.e. PMU/PIU, contractors/surveyors/IPs/consulting firms on the importance of addressing SEA/SH risks, code of conduct implementation, separate GBVCC its role and responsibilities, community awareness on GRM, reporting and response mechanism for GBV/Survivors', engaging stakeholders on redressal of GBV/SEA/SH risks, development of IEC material on GBV/SEA/SH, mapping of service providers and linkages development with departments providing services to GBV/SEA/SH survivors.

The report has five (5) Chapters and Chapter 3 discusses primarily: (a) the approach and methodology adopted for carrying out the risk and capacity assessment in the field, the key findings of GBV/SEA/SH risks that might be arising from project activities, based on the analysis of KIIS and FGDs, (b) findings and analysis of the training needs assessment of PMU/PIU, IPs/Contractor/Surveyors, communities, and beneficiaries potential risks associated with Environmental and Social Standards 4.

Chapter 4, based on the key findings and recommendations, describes a dedicated Mitigation Action Plan to respond to cases of GBV/SEA/SH with timelines and responsibility. It also provides a comprehensive Responsibility/Accountability Response Framework for GBV/SEA/SH incident handling procedures and protocols for the provision of assistance/services along with oversight and monitoring of the Plan.

Chapter 5 describes in detail the GRM concerning GBV/SEA/SH risks to address complaints confidentially and transparently with no personal judgment and impacts. The proposed GRM protocols described for the project emphasize multiple access options, e.g. a GBVCC at PMU/PIU with clearly articulated roles and responsibilities to investigate the cases of GBV/SEA/SH reported under the PULSE project. Chapter 5 also illustrates GBV/SEA/SH case handling procedures and protocols for the provision of assistance and support as well as oversight and monitoring of the action plan. It also provides a calendar of training/awareness sessions for enhancing the capacity of responding and mitigating the GBV/SEA/SH risks during the implementation of the PULSE Project. The final report on MAP is supported by more information/documents provided in the annexes.

**CHAPTER**

**1**

**(Introduction)**

## Chapter 1: Introduction

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The Government of Punjab is implementing the Punjab Urban Land Systems Enhancement Project (PULSE) with a US\$150 credit million from the International Development Assistance (IDA), World Bank. The objective of PULSE is to support the Government of Punjab with improved land records and identification of land for development, including land for housing programs. PULSE aims to achieve: (i) the provision of digital land records linked to cadastral maps and DRM data; (ii) improved tenure security and access to land for housing; (iii) a unified modern land information system; and (iv) a strengthened capacity and regulatory framework. In this context, the people of Punjab, particularly women and vulnerable groups, will benefit from increased security of land entitlements and property rights.

Gender is a cross-cutting aspect of the PULSE project to secure women's land rights, and improve the social well-being of women and their families while enhancing investment in child health, nutrition, and education. Gender participation is an in-built feature of project implementation methodology to ensure that all interventions are gender responsive and offer: (i) equal opportunities to women employment under the project; (ii) developing a gender-sensitive human resources policy and outreach strategy ensuring women's participation; (iii) training of staff in gender sensitization to encourage the client to register land rights in the name of women or jointly; and (iv) particular attention on awareness-raising regarding the regulatory framework for the protection of women's rights.

The project contributes towards achieving the objectives of the National Vision 2016-2025 of Pakistan and will supplement the efforts of the Government of Pakistan towards the achievement of global commitment to Sustainable Development Goal (SDG) 5: to achieve gender equality and empower all women and girls.

During the process of assessing risks and capacity to respond to GBV/SEA/SH carried out by the Development Alternatives (DAs) as per approved work plan and TORs, the project components were reviewed to identify GBV/SEA/SH potential risks and impacts during upgradation of land records through digitization, survey, and parcel mapping activities. The risk assessment exercise was conducted by using the diagnostic questionnaires for KIIs and FGDs to assess the GBV/SEA/SH risks that can arise during the identification of the land, land entitlements, registration, and regularization process including the issue of katchi abadis or informal settlements on state land under the broad framework of the Punjab Katchi Abadis Act 1992.

GBV/SEA/SH is a global issue that affects one out of three women in their lifetime. Incidents of GBV/SEA/SH have occurred in projects and programs financed by the World Bank. As a result, the Bank is taking concerted measures to strengthen its approach related to the management and prevention of GBV/SEA/SH risks. Moreover, there is a substantial risk of GBV/SEA/SH within families and communities, when women claim their inheritance rights.

According to the United Nations Food and Agriculture Organization (FAO)<sup>1</sup>, women's land ownership in Pakistan is very low. The report also indicates that women own only 2% of agricultural land in Pakistan. Furthermore, women face significant challenges in accessing and owning land due to cultural and social norms, legal barriers, and limited economic resources. In recent years, efforts have been made to improve women's land ownership in Pakistan. The government has launched several initiatives to provide ownership rights to women, especially through legislation. However, there is still a long way to go to achieve gender equality in land ownership in Pakistan. The constitution of Pakistan ensures all citizens can own property and the most practiced Shariah law stipulates land rights for

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<sup>1</sup> According to a report by the United Nations Food and Agriculture Organization (FAO), 2019,

women. Yet, 97% of women do not inherit land or a house despite their inheritance rights provided for under the law. Women are 25% less likely than men to own land and 69% less likely to own a house<sup>2</sup>. Inequality between the genders in access to land in Pakistan is due to customs and cultural norms<sup>3</sup> rather than written laws.

In Pakistan, GBV/SEA/SH is a multi-faceted, interrelated, and recurring issue. It includes physical, sexual, psychological, emotional, and economic abuse and exploitation, occurring in both private and public spaces, while grounded in elements of situational and socio-cultural factors. According to the Multiple Indicator Cluster Survey 2017-2018, 28% of women (15-49 years) have experienced physical violence since age 15 in Pakistan. 34% of ever-married women have experienced spousal physical, sexual, or emotional violence<sup>1</sup>. In Punjab, 1 in 3 women between 15 and 64 years has faced some form of violence<sup>2</sup>. 76.7 % of women (15-49 years) in Punjab have experienced assault within their homes. 56% of Pakistani women never sought help or disclosed GBV due to socio-cultural and other problems regarding accessibility to health care and psycho-social support services. Considering the situation, PULSE includes interventions on strengthening response risks of GBV/SEA/SH to mitigate project-specific risks in the field.

## 1.1 Definitional Aspects of GBV/SEA/SH

The Inter-Agency Standing Committee (IASC) defines **Gender-based Violence** as an umbrella term for any harmful act that is perpetrated against a person's will, and that is based on socially ascribed (gender) differences between males and females. GBV broadly encompasses physical, sexual, economic, psychological, and emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families, and in the community at large. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm.

The United Nations defines **Sexual Exploitation and Abuse (SEA)** as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. Sexual abuse on the other hand is "the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions." SEA is therefore a form of gender-based violence and generally refers to acts perpetrated against beneficiaries of a Project by staff, contractors, consultants, workers, and Partners.

**Sexual Harassment (SH)** occurs between personnel/staff and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature.

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<sup>2</sup> Pakistan Demographic and Health Survey (2017-2028)

<sup>3</sup> Women Economic and Social Well Being Survey (2017-2018), Punjab Commission on Status of Women

## 1.2 Project-Related GBV/SEA/SH Risks

The PULSE project needs to integrate a gender perspective into overall policies, strategies, components, and activities to promote gender equality. For this purpose, the PULSE project will develop a Gender Strategy that will ensure that both women and men can equally participate in project implementation and benefit from social, economic, political, and cultural spheres for accessing legal land rights. The project policies, programs, or actions are designed to address different marginalized gender-marginalized groups (women, PWDs, transgender persons, and minorities) and identify potential disparities. The project's gender-responsive approaches, processes, and procedures will address gender inequalities, closing the gender-gap on women's land rights by increasing the percentage of women having legally recognized land records on their names and achieving the Project Development Objective (PDO).

While reviewing the PULSE project components, it is observed that improved accessibility of land record services for women and other vulnerable groups will contribute to protecting women's legal property rights. Nonetheless, it may also lead to GBV/SEA/SH related risks perpetrating disputes over land, resources, and property distribution.

The probability of GBV/SEA/SH risks is higher in contexts where power imbalances exist in workplaces, institutions, or communities. The female workforce involved in the project activities may be at risk of SEA/SH either within their workplaces or during field activities. To address GBV/SEA/SA risks expected during the project implementation, the DAs have diligently carried out a thorough assessment to identify potential GBV/SEA/SH risks along with the response capacity. A mitigation approach has been proposed in the form of GBV/SEA/SH Risk Mitigation Action Plan, which will help assess and manage the GBV/SEA/SH risks consistent with the Environmental and Social Standard 4 (ESS4) and propose interventions to address such risks together with the corresponding impact that may arise during the implementation process.

**CHAPTER**

**2**

# **(Regulatory Framework)**

**Provincial Laws, Policies and Strategies for Women's safety**

## Chapter 2: Regulatory Framework

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In the present times, gender-based violence has increased significantly and is considered a global pandemic. Worldwide approximately 736 million women are being subjected to various forms of violence which creates a negative impact on their wellbeing and undermines their ability to participate in social affairs. Violence not only affects women, but it also affects the entire family, community, and country. Globally, 155 countries have passed legislations against domestic violence, but challenges remain in place in the form of law enforcement and access to safety and justice (WHO, 2021). The empirical evidence also presents a gloomy picture around the world concerned with gender-based violence and Pakistan is no exception. This chapter provides a brief account of various legislation and regulatory mechanisms introduced at global, national, and provincial levels to address the issue of gender-based violence.

### 2.1 International Instruments

There are several international instruments and conventions that address gender-based violence and promote gender equality. Some of the key ones include:

#### 2.1.1 Convention for Elimination of All Forms of Discrimination Against Women (CEDAW):

Adopted in 1979 by the United Nations General Assembly, CEDAW is often described as an international bill of rights for women. It calls for the elimination of discrimination against women and includes provisions related to violence against women. It also reiterates and guarantees rights given to women under the International Covenant on Civil Political Rights and the International Covenant on Economic, Social, and Cultural Rights.

**2.1.2. Declaration on the Elimination of Violence Against Women:** Proclaimed by the United Nations General Assembly in 1993, this declaration defines violence against women and emphasizes the need to take measures to prevent and eliminate such violence.

**2.1.3. Beijing Declaration and Platform for Action:** Adopted at the Fourth World Conference on Women in Beijing in 1995, this document outlines a comprehensive plan for achieving gender equality and addresses issues related to violence against women.

**2.1.4. United Nations Security Council Resolution 1325 (UNSCR 1325):** Adopted in 2000, this resolution focuses on the impact of armed conflict on women and recognizes the importance of women's participation in conflict resolution and peacebuilding. It emphasizes the prevention of violence against women in conflict situations.

**2.1.5. Declaration on the Elimination of Violence in the Field of Sports:** Adopted by the United Nations Educational, Scientific and Cultural Organization (UNESCO) in 2006, this declaration addresses gender-based violence in the context of sports and calls for measures to prevent and eliminate such violence.

**2.1.6. Istanbul Convention (Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence):** Adopted in 2011, this convention is the first legally binding instrument in Europe that specifically addresses gender-based violence. It covers various forms of violence against women and domestic

violence and calls for preventive measures, protection of victims, and prosecution of perpetrators.

These instruments provide a framework for addressing gender-based violence and promoting gender equality at the international level. It's important to note that while these conventions and resolutions set standards, their effectiveness depends on the commitment of individual countries to implement and enforce them. Many countries also have their own national laws and policies addressing gender-based violence.

### **2.1.7 Good Practice Notes (GPN) 2020 2<sup>nd</sup> addition**

The World Bank (WB) has developed GPN to identify risks of SEA/SH as opposed to all forms of GBV that can emerge in IPF involving major civil works contractors- and to advise the borrowers on how to best manage such risks. The GPN is to support the implementation of the Environmental and Social Framework in WB financed operations. The GPN is designed to address SEA/SH risks in investment project financing (2nd addition 2020) Procurement Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Measures. The GPN is guided by following key principles:

- a. Be survivor-centered: Approach considerations related to GBV prevention, mitigation, and response through a survivor-centered lens, protecting the confidentiality of survivors; recognizing them as principal decision-makers in their care; and treating them with agency, dignity, and respect for their needs and wishes.
- b. Emphasize prevention: Adopt risk-based approaches that aim to identify key risks of SEA/SH and undertake measures to prevent or minimize harm.
- c. Build on existing local knowledge: Engage community partners - local leaders, civil society organizations, gender, and child advocates - as resources for knowledge on local-level risks, effective protective factors, and mechanisms for support throughout the project cycle.
- d. Be evidenced-based: Build on existing global research and knowledge on how to address GBV effectively.
- e. Be adaptable: Adapt and adjust prevention and mitigation measures to respond to the unique drivers and context in any given setting, using the operational guidance presented in this GPN, which provides the foundation for an effective SEA/SH risk management approach.
- f. Minimize harm to women and girls: The project staff must be trained on how to preserve the safety of women while interviewing/collecting data on this topic. Women may suffer physical harm and other forms of violence if partners/perpetrators discover that they have been talking to others about their personal relationships. Because many violent partners/perpetrators control the actions of women with whom they are in a relationship, even the act of speaking to another person without their permission may trigger a woman's beating. As such, asking women about violence should be confidential, and should take place in complete privacy, except for children under the age of two. Consent for any data collection, even as part of a case file, should be offered and if anonymity can be guaranteed, it should also be provided.
- g. Enable continuous monitoring and learning: Ensure operations integrate mechanisms for regular monitoring and feedback to track effectiveness and to build internal knowledge of what works to prevent, mitigate, and respond to SEA/SH.



## 2.2. International Best Practices and Lessons Learned

Implementing and refining these practices requires a collective effort and ongoing commitment to creating a world free from gender-based violence. Some of the global and regional best practices to address the GBV/ SEA/ SH are highlighted as under.

- a. Legal Framework and Policies:
  - Establish and enforce comprehensive legal frameworks that criminalize all forms of GBV.
  - Implement and regularly review policies that prevent gender-based violence.
- b. Prevention Programs:
  - Develop and implement community-based prevention programs that challenge harmful gender norms and promote healthy relationships.
  - Include GBV prevention education in school curricula.
- c. Support Services:
  - Ensure the availability of accessible and confidential support services for survivors, including hotlines, counseling, and shelters.
  - Train healthcare professionals, law enforcement, and social workers to respond sensitively to GBV cases.
- d. Data Collection and Research:
  - Invest in comprehensive data collection systems to understand the prevalence and patterns of GBV.
  - Support research to identify root causes and effective interventions.
- e. Community Engagement:
  - Engage communities in awareness campaigns and educational programs to challenge stereotypes and promote gender equality.
  - Encourage bystander intervention and community-based solutions.
- f. Workplace Initiative and Media Advocacy:
  - Implement workplace policies that address GBV and create a safe and inclusive environment.
  - Foster collaboration among government agencies, NGOs, civil society, and other stakeholders to avoid duplication of efforts and ensure a coordinated response.
  - Work with media outlets to raise awareness about GBV and challenge harmful portrayals of gender in the media.
  - Encourage responsible reporting on GBV issues.
- g. International cooperation:
  - Foster international collaboration to share best practices, resources, and expertise in addressing GBV.
  - Support global initiatives aimed at preventing and responding to GBV.

Streamlining lessons learned from the international best practices requires a holistic approach to ensure that GBV/ SEA/ SH is a complex issue with multiple determinants. It needs to be established that addressing GBV/SEA/SH is a long-term commitment that necessitates sustained monitoring and evaluation through enforced collaboration among government entities, NGOs, civil society, and other stakeholders to avoid duplication of efforts and have a coordinated response. Interventions should be comprehensive, addressing social, economic, and cultural factors. Considering the intersectionality of identities, such as race, ethnicity, sexuality, and socioeconomic status, it is important to ensure that

the proposed interventions are inclusive and address the unique challenges faced by different groups. Empowering individuals, particularly women and girls through education and economic empowerment is a major area of intervention for reducing vulnerabilities to GBV. In the post-pandemic era, the use of technology has been increased manifold. For streamlining global best practices into actional policies, the use of technology for prevention, reporting, and support services is highly recommended. The use of technology is also prioritized to ensure that it is accessible, safe, and respects privacy. Also, survivor-centered approaches need to be promoted that prioritize the needs and choices of survivors, including their safety and well-being.

## **2.3 National Instruments**

Pakistan still has a patriarchal and feudal social structure where women face violence and discrimination for being women in every sphere of their lives. Over the decades, to reduce the violence and discrimination against women, the government has taken several legislative measures to ensure an improved and equal status for women, but the situation has not been much improved. It is argued that the underlying reason lies in the lack of will at the implementation stage, where male-dominated government institutions support the patriarchal structures. In the context of Pakistan, like many other countries, various national instruments and initiatives have been established to address and combat gender-based violence. Some of these instruments include:

### **2.3.1 Constitution of the Islamic Republic of Pakistan**

The Constitution of Pakistan guarantees equal rights to all citizens, irrespective of gender. It provides a basis for challenging discriminatory practices and policies. The article 23 of the 1973 Constitution guarantees the right to property for every man and woman in the country.

### **2.3.2 Pakistan Penal Code (PPC)**

The PPC contains provisions related to crimes against persons, including those specific to crimes against women. Amendments have been made to strengthen laws against rape, honor killings, and other forms of violence.

### **2.3.3 Protection of Women (Criminal Laws Amendment) Act 2006**

This act amended certain sections of the PPC to provide more protection to women against crimes such as acid attacks and honor killings.

### **2.3.4 Domestic Violence (Prevention and Protections) Act 2012**

This legislation aims to prevent domestic violence and protect victims. It provides legal mechanisms for obtaining protection orders and recourse for victims.

### **2.3.5 Prevention of Anti-Women Practices Act 2011**

The Prevention of Anti-Women Practices (Criminal Law Amendment) Act 2011 prohibits several oppressive and discriminatory customs practiced towards women in Pakistan. Customary practices that are criminalized under this Act – this includes Under section 498-A PPC, depriving women from inheriting property by deceitful or illegal means is punishable with imprisonment of 5 – 10 years, or a fine of 1,000,000 rupees, or both.

### **2.3.6 Hudood Ordinance Reforms**

Amendments have been made to the controversial Hudood Ordinances to address issues related to rape and adultery. These changes were introduced to provide better protection to victims and ensure fair legal processes.

### **2.3.7 National Commission on the Status of Women (NCSW)**

NCSW is an autonomous body that works to ensure that women's rights and concerns are integrated into policies and programs. It also plays a role in advocating for gender equality.

### **2.3.8 National Plan of Action for Human Rights 2021-2026**

The government of Pakistan has developed National Plans of Action that address human rights issues, including those related to gender-based violence.

### **2.3.9 Women Protection and Rehabilitation Centers (WPRCs)**

These centers are established to provide shelter, medical assistance, and legal support to women who are victims of violence.

It is important to note that despite these legal frameworks, challenges persist in the effective implementation and enforcement of these laws. Cultural and societal factors, as well as gaps in the legal system, contribute to the continuation of gender-based violence. Ongoing efforts are being made by government agencies, non-governmental organizations, and activists to address these issues and promote gender equality in Pakistan.

## **2.4 Provincial Instrument:**

### **2.4.1 Punjab Protection of Women Against Harassment at Workplace Act 2010**

Under this Act, there are provisions for the protection of women from harassment at the workplace and a code of conduct is illustrated for workplaces to ensure a work environment free of harassment and intimidation.

### **2.4.2 The Punjab Protection of Women Against Violence Act 2016**

The Act aims to provide justice to women victims by establishing and institutionalizing mechanisms that provide protection from all forms of Violence Against Women (VAW) crimes. It is the first legislation in the history of Punjab, which has its own implementation mechanism, known as Violence Against Women Centers (VAWCs). These Centers are being established through a phased program with the pilot VAWC inaugurated in Multan in March 2017. As per the Act, all wrongs committed against women have been made an offense including abetment of an offense, domestic violence, sexual violence, psychological abuse, economic abuse, stalking, and cybercrime. It also provides civil remedies to victims in addition to the already existing criminal ones. These include Protection Order, Monetary Order, and Residence Order. Thus, the aggrieved can initiate parallel criminal proceedings for VAW offenses already covered in the Pakistan Penal Code and other existing laws if she wants to.

### **2.4.3 Punjab Women Protection Authority Act, 2017**

The Act provides an effective protection system for the rescue, protection, shelter, and rehabilitation of women facing violence. The authority is working as an autonomous body attached to the Social Welfare and Bait-ul-Maal (SW and BM) Department in the province. The core objective of setting up this authority is to facilitate, ensure, and oversee the implementation, of institutional measures stipulated under the Punjab Protection of Women against Violence Act 2016, including the establishment of District Women Protection Committees, Violence against Women Centers, and hiring of Women Protection Officers (WPOs).

### **2.4.4 Punjab Women Development Policy 2018**

The policy envisages a gender-sensitive Punjab where women and men enjoy equity and equality in all walks of life. Women and girls can fulfill their roles toward achieving and enjoying individual and collective well-being, development, and prosperity without any explicit or implicit discrimination.

### **2.4.5 Punjab Enforcement of Women’s Property Rights Act 2021**

The Punjab Enforcement of Women’s Property Rights Act, 2021 provides due respect to the women in society and guarantees their rights of ownership and possession of properties owned by women, ensuring that such rights are not violated using coercion, fraud, fabrication, forgery, and cheating, etc. The Act provides an effective and speedy redressal mechanism to protect and secure the rights of ownership of women in property. Under the Act, the Ombudsperson will deal with all the issues regarding the matters of the ownership of women in property and where he/she deems fit, direct the officer-in-charge of a police station for such assistance as may be required for implementing the orders. Nevertheless, barriers persist due to structural flaws in the legislation that obstruct the implementation of the law, particularly for women residing both in urban and marginalized rural areas of Pakistan.

## **2.5 Project Specific Instruments**

As the project is committed to the WB Environment and Social Commitment Plan (ESCP), the material measures and actions have been set out to ensure the Project is implemented following the Environmental and Social Standards (ESS).

### **2.5.1 Environment and Social Management Framework (ESMF)**

The ESMF developed for the project sets out the principles, rules, guidelines, and procedures to assess the environmental and social risks and impacts. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing project risks and impacts, including on its capacity to manage environmental and social risks and impacts.

### **2.5.2 Labour Management Plan (LMP)**

The LMP outlines policies, procedures, and strategies that will be employed to ensure that labor within the project is treated fairly and equitably and that the project is implemented in accordance with local labor laws and regulations. The key objectives of the plan are to promote safe working conditions, prevent discrimination and harassment of women, and ensure that all workers are provided with appropriate training and support. The plan will enforce provisions of provincial laws related to anti-harassment and prevent violence against women.

### **2.5.3 Stakeholder Engagement Plan (SEP)**

SEP was developed under the World Bank’s ESMF and as per the ESS 10, “Stakeholder Engagement and Information Disclosure,” the implementing agencies are required to provide stakeholders with timely, relevant, understandable, and accessible information and consult with them in an appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. Under the project, vulnerable groups (Women Inheriting Property, Residents of Katchi Abadis, Minorities and landless and Groups Below the Poverty Line) were identified for the project, and the stakeholder engagement exercise will be designed to ensure that they are consulted regularly and included in key decision-making processes.

### **2.5.4 Communication Strategy**

The communication function for PULSE is housed in the PMU to align the communication strategy behind the wider reforms undertaken by the provincial government. The Communications Strategy’s objectives include establishing effective internal and external communications with all stakeholders, conveying the Bank’s assistance to the Government of Punjab in key messaging, creating awareness and ownership among beneficiaries, supporting all programmatic interventions, improving project delivery and perceptions. Communication strategy focuses on gender sensitization and requires designing special activities and rolled out. The awareness campaigns will cover the following themes,

Legal Rights of women on land ownership and inheritance, Social and cultural barriers and access to information and resources for land registration processes, and GBV/ SEA/ SH.

### **2.5.5 Gender Strategy**

The PULSE project has an integrated gender strategy which has been finalized, approved, and is currently available on the PULSE project website.

### **2.5.6 Grievances Redressal Mechanism (GRM)**

As per the Project Appraisal Document (PAD) of the PULSE project, an online complaint registration system, GRMIS will be set up for the project. Grievance/Complaint redressal committees are proposed at PMU/PIU and Tehsil level. Records of all grievances/complaints will be maintained in a central database, and an appeals system will be part of the GRM.

### **2.5.7 Standard Operating Procedures (SOPs) for Environmental and Social Safeguards**

The project will establish SOPs to ensure compliance with ESCP and ESMF frameworks to ensure: (i) social and environmental risk assessment and mitigation measures have been prepared; (ii) relevant stakeholders and community is engaged; (iii) vulnerable groups are being safeguarded and (iv) environmental and social performance monitoring and compliance is taking place in accordance with the WB guidelines.

In addition, the project has developed SOPs for E&S safeguards for survey and digital mapping. The SOPs provide structured guidance on (i) compliance with WB policies; (ii) risk management; (iii) safeguarding vulnerable groups; (iv) stakeholder engagement; (v) E&S performance monitoring; and (vi) accountability and transparency. The SOPs highlight gender actions throughout the land parcel survey procedures, particularly, during training and stakeholder orientation/consultation sessions.



## Chapter 3: Process Followed:

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### 3.1 Contextual Risk

When addressing GBV/SEA/SH in the context of PULSE assignment objectives, some specific contextual risks and challenges should be considered. The level of risk is influenced by the specific context or environment in which GBV/SEA/SH risk related incidences happen, and which includes factors such as the socio-economic dynamics, geography, economic conditions, regulatory environment, and other contextual elements that may impact the nature and magnitude of GBV/SEA/SH risks. Here are some potential contextual risks related to GBV/SEA/SH in an assignment focused on land titling:

- 1. Sexual Exploitation and Abuse/Sexual harassment at Work:** Even though the Government of Punjab has provided legal protection to women under the Punjab Protection of Women against Harassment at Workplace Act 2010, incidents do occur in different work scenarios due to power imbalances, lack of awareness and social stigma which prevent survivors from reporting incidents.
- 2. Patriarchal Social Norms:** In Punjab, societies with deeply rooted patriarchal norms, cause resistance to recognizing and providing women's land rights, leading to the potential risk of GBV/SEA/SH against women who do ask for their legal land rights.
- 3. Lack of Legal Protections:** In regions in which legal frameworks do exist but due to weak enforcement mechanisms, women may face increased vulnerability to GBV/SEA/SH risks.
- 4. Displacement and Land Disputes:** Land titling processes can sometimes lead to disputes and conflicts, resulting in the displacement of non-titleholders or weaker co-titleholders. Women may be disproportionately affected, facing increased risks of SEA/SH in such situations.
- 5. Access to Justice:** Limited access to justice for survivors of GBV/SEA/SH may undermine efforts to address violence related to workplaces and land titling issues, as survivors may be hesitant to report GBV/SEA/SH cases due to fears of retaliation or lack of legal support.
- 6. Economic Dependence:** Economic dependency on male family members can make women more vulnerable to GBV/SEA/SH risks in situations where land rights are contested or threatened.
- 7. Community Resistance:** Resistance from conservative communities or local authorities to recognize and implement gender-sensitive land titling policies may contribute to GBV/SEA/SH risks.
- 8. Inadequate Training and Awareness:** Lack of training and awareness programs on GBV/SEA/SH risks that may arise during the project implementation either at project-related work environments or where land titling is taking place can exacerbate the risks of violence.
- 9. Inequitable Representation:** In situations where women are underrepresented in decision-making processes such as in workplaces, inquiry or selection committees, or matters

related to land titling, their interests may not be adequately considered, and can lead to increasing the risk of GBV/ SEA/SH.

- 10. Cultural Practices:** Social and cultural practices that discourage the participation of women in matters of land ownership and inheritance may hinder efforts to ensure women's land titling, exposing women to GBV/ SEA/ SH risks.
- 11. Conflict and Post-Conflict Settings:** Land titling processes in areas affected by conflict or post-conflict situations can exacerbate GBV/SEA/SH risks, as women may be targeted during property disputes or face increased vulnerability due to the breakdown of social structures.
- 12. Inadequate Safeguard Mechanisms:** Insufficient safeguards within project work environments and land titling processes to address and prevent GBV/SEA/SH, such as confidentiality measures or support services for survivors, may contribute to underreporting and a lack of protection against GBV/SEA/SH risks.
- 13. Lack of Community Support Services:** Limited availability of support services, such as counseling or shelters, for survivors of GBV/ SEA/ SH may hinder the recovery process and discourage reporting.

Addressing the GBV/SEA/SH risks requires a comprehensive and gender-sensitive approach to assess, manage, respond and prevent risks of GBV/SEA/SH that arise from the PULSE project activities related to land titling especially women landholders. It will also require an effective accountability and Response Framework, and assessment of the capabilities of the GBV/SEA/SH service providers in and around the project location to provide quality survivors-centered services including case management and referral pathways for creating sustainable and equitable solutions.

### **3.2 Existing Risk Management System and Institutional Gaps**

As per PAD, the Environmental and Social Framework (ESF) applies to the PULSE project. The project's environmental risk rating is moderate whereas the social risk rating is high. Based on the experience in implementing WB funded Projects, PULSE has developed a few safeguard documents, and other documents are under the process of development to ensure the protection of people and communities to work with, including mechanisms to limit, report, and respond to potential cases of GBV/ SEA/SH under ESMF and ESCP. These documents include (a) Stakeholder Engagement Plan, (b) Labor Management Plan (LMP), Communication Strategy, and Gender Strategy along with GRM and notification of GRCs.

Based on desk review and field assessment existing risk management system of the project addresses the GBV/SEA/SH risks to some extent, nevertheless there is a need for an institutionalized system and systemic approach to address GBV/SEA/SH risks in its real perspective during the implementation of PULSE project throughout its life across all targeted districts.

It needs to be a contractual requirement for the Contractors/ Surveyors, IPs, and Consulting Firms to have in place the Code of Conduct (CoC) and GBV/SEA/SH prevention and response action plan. It will also be the responsibility of the PMU/PIU to ensure that SOPs on GBV/EA/SH are in place, monitor compliance with the WB guidelines, and apply penalties as provided for in the contract in case the contractors are not complying.

While reviewing the above-mentioned documents, policies, strategies, and SOPs, it has been observed that there is a strong need to prepare a GBV/ SEA/SH risk Mitigation Action Plan. The GRM manual



needs to be reviewed with the GBV/SEA /SH lens. No GBV/SEA/SH GRC is being added to the drafted manual to address the GBV/SEA/SH risk expected to arise during the implementation project.

In the pilot districts of the project, during assessment, most of the staff was unaware of complaints. The ARCs are established (under the previous WB project (LRMIS) and a complaint system is in place, however, there is no system to address the risk of GBV /SEA/SH to the women or vulnerable groups.

### **3.3 Risk and Capacity Assessment Process and Analysis**

A robust process for risks and capacity assessment was adopted to respond to and prevent GBV/SEA/SH risk and analysis which helped to identify critical markers to address project-related risks. The following tools were used in the field of GBV/ SEA/SH risk assessment. The detailed work plan adopted for the commencement of the assignment is available in Annex-1.

**Desk review** was carried out and several related documents were studied. The World Bank Good Practice Note addressing GBV/SEA/SH in Investment Project Financing involving major Civil Works and Operations (2nd Edition, 2020) addressing sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Measures were read through as reference documents.

**Primary data collection:** Stakeholder consultations with KIIs and FGDs were carried out to assess potential GBV/ SEA/SH risks and institutional capacity of the PMU-BoR, Implementing Partners, and relevant stakeholders. The purpose of GBV/SEA/SH risk and capacity assessment includes the following:

- a. Identify key findings of GBV/SEA/SH risks arising from project activities, based on the analysis of KIIS and FGDs.
- b. Find and analyze the training needs assessment of PMU-BOR and IPs, leading to a training calendar with contacts of potential trainers.
- c. Propose recommended components for the GBV/ SEA/SH risk mitigation plan.

### **3.4 Stakeholder Consultations**

The DAs team carried out KIIs with project stakeholders i.e., PLRA, BoR/ PMU/PIU, IPs (Contractors)Ombudsperson-Punjab, Women Development Department, Deputy Commissioner Revenue, Deputy Commissioner General, Assistant Commissioner, officials of Arazi Center, Social welfare department, Local Government & community development, Law enforcement Agency and Directorate of katchi Abadis. FGDs were conducted with contracted workers, surveyors, community women and men, adolescent girls, transgender persons, minorities, PWD, local community leaders, women CBOs members, Women Crisis Centre workers, and NGOs working in the area. The following section provides the key findings and analysis of GBV/SEA/SH risks and capacity assessment as a result of KIIs and FGDs. A summary of stakeholder consultation is available in Annex-2 of the report.

#### **3.4.1 Key Informant Interviews (KIIs)**

A series of fifty-four (54) key informant interviews with a broad range of relevant stakeholders were carried out. In this regard, the concerned stakeholders were divided into main groups, which included PMU/PIU, Contractors, District Administration, Women Development Department, Ombudsperson-Punjab, Social Welfare Department, RDA, MDA, PHATA Local Government & Community Development, Law enforcement Agencies and Directorate of katchi Abadis. The main objective of the discussions with departments was to assess potential GBV/SEA/SH risks that can arise during the implementation of the project and identify referral pathways at provincial and district levels. The following areas were mainly discussed:

- a. Ascertain the level of their knowledge and understanding of the issues of GBV/SEA/SH faced by staff and women approaching these officials.
- b. Review the policies and strategies related to the prevention of GBV/SAE/SH risks.
- c. Review the existing monitoring protocols and document existing measures available/adopted.
- d. Identify relevant organizations and community actors to provide information and support for GBV/SEA/SH-related initiatives.

### 3.4.2 Focus Group Discussions (FGDs)

In the GBV/SEA/SH risk assessment process, FGDs were conducted to get firsthand information from the community including women, girls, transgenders, PWDs, and members of local CBOs. Under the PULSE project, the most important and high-risk areas of GBV/SEA/SH are expected in direct women workers, contracted women workers, and beneficiaries of the project. Further, GBV/SEA/SH risks to beneficiary women from family and male community members on issues arising due to the involvement of women in surveys on land/property ownership were discussed. The selection of participants for FGDs was carried out in accordance with the definition of groups that are at risk (women, adolescent girls, elderly, persons with disability, minorities, transgenders, and other vulnerable groups from communities in project districts because of the influx of surveyors, revenue staff and other contracted IPs staff hired under the project. A total of nine (09) FGDs were conducted in five (05) target districts.

### 3.4.3 PULSE Project GBV/SEA/SH Risk Assessment Data Collection Instruments

To assess risks and capacity to respond to GBV/SEA/SH risks, the diagnostic questionnaires for KIIs/FGDs were developed for the collection of qualitative information on issues analyzed as part of the assignment. For information gathering from key stakeholders in government departments, a set of informant interview guides was developed. A guide for FGDs was also prepared to collect information from different groups of relevant stakeholders across the target districts.

### 3.4.4 Field Work

A team of experienced experts, researchers, and facilitators/note-takers were engaged for data collection in nine (9) target districts of the PULSE project.

**Orientation:** The field teams of DAs were provided a one-day virtual orientation and training session on GBV/SEA/SH risks, PULSE project related GBV/SEA/SH risk assessment, and the tools for data collection. The fieldwork was initiated from October 19, 2023, onwards for KIIs with different stakeholders and organization of FGDs until October 31, 2023. The KIIs were held in a hybrid form, with most of the interviews in person, while some were conducted virtually.

For quality assurance of the GBV/SEA/SH, interviews were audio recorded. Once all FGDs and KIIs notes (questionnaires) along with audio recordings were received, they were reassembled in the DA's office for data analysis. During this exercise, common emerging themes and recommendations were identified to develop the report on key findings and recommendations to address the project related GBV/SEA/SH risks, as well as to assess risks and findings related to other ongoing efforts to complement them through the PULSE project. It is important to link the project interventions, to the extent possible, with the existing activities in the Social development sector, and other GBV/SEA/SH related service providers, such as Justice/ security, psychosocial support, and economic empowerment programming.

## 3.5 Findings and Analysis of Project-Related GBV/SEA/SH Risks

GBV/SEA/SH can affect individuals and vulnerable groups across various demographic settings. However, large numbers of marginalized groups may be at risk due to various factors. Some of the groups that are often identified as being at the highest risk and vulnerable to the risks of GBV/SEA/SH

include women, all categories of women workers hired directly or contracted by IPS, contractors/consultants, and community workers. Other vulnerable groups such as adolescent girls, the elderly, PWDs, minorities, transgenders, and other disadvantaged groups of communities in the project districts may be at risk. Their vulnerability is related to the influx of surveyors, revenue staff, and other contracted IP staff hired under the project. Risk of GBV/SEA/SH to beneficiary women and transgender persons from family and male community members on issues arising due to the involvement of women in survey on land/property ownership.

During the GBV/SEA/SH risks and capacity assessment process, the KIIs were conducted with women working in PMU/PIU, district government, contractors/ surveyors, IPs, and community workers hired for surveys. These women by type of contract are direct workers, contracted workers, and regular government employees. All women consulted for KIIs are local and were not migrants from other districts.

### 3.5.1 Consultation with PMU/PIU

The PMU/PIU team included a Gender Specialist (GS), GRM Specialist, Environment Safeguard Specialist (ESS), Social Safeguard Specialist (SSS) and Geographic Information Systems (GIS) Specialist. GS is making efforts to ensure gender mainstreaming and risk mitigation of GBV/SEA/SH in the project. An inquiry committee on harassment is operational at the PMU level with a GS Specialist being a member of the committee. The notification and composition of the committee is attached as Annex-3.



FIGURE 1: CONSULTATION MEETING WITH PMU TEAM

During the consultation, the team was informed that the project has conducted training of staff on the Code of Conduct (CoC) and the inquiry committee for the protection of women against harassment at the workplace to address any GBV/SEA/SH risks. It was shared that no incidence of GBV/SEA/SH has been reported by any PMU/PIU women employee thus far.

During the PMU/PIU visit, it was observed that the code of conduct was properly displayed at the main entrance of the office and accessible to all employees. In PMU, a Staff Grievance Redressal Committee (SGRC) was notified and operational. During consultation with the PMU staff, it was observed that they were aware of the GBV/SEA/SH terminology, laws, regulations, and reporting mechanism. The GBV/SEA/SH related training is recommended for all cadre staff including support staff/drivers and staff working on daily wages at PMU/PIU.

### 3.5.2 Consultation with Contractors and IPs

During a consultation with staff of IPs working on RoD/survey, the staff ratio concerning men and women was found as 60:40. The workload and compensation to both gender by contractors/surveyors and IPs are almost equal and where needed women are compensated i.e., not calling them for night shift work, lunch breaks, separate washrooms, prayers, and restrooms are allocated separately for women staff. Women engaged in the survey are mostly local and move with the team and they have not faced any issue of GBV/SEA/SH both in the office and at community level. The contractors/ surveyors and IPs were of the view that there is potential risk related to exploitation and abuse in the project areas. The GBV/SEA/SH related cases may also arise within the staff in the future. To mitigate the potential risk, the contractors and IPs have formulated and implemented a code conduct (signed by each staff), a complaint registration process was put in place by a couple of IPs, harassment committees were made functional, and women have open access to person, through email, via telephone to the senior management, gender focal persons, committees, and HR officials.



Consultation with IP's/Contractors

### 3.5.3 Consultation with Women staff

It has been observed that Under the PULSE project, the implementers and contractors have recruited almost 30-40% female staff for digitization and survey services, as well as other activities. This female workforce will be a potentially high-risk group for GBV/SEA/SH in the project.

During the discussions with PMU/PIU, it was confirmed that an inquiry committee was constituted as under Punjab Protection of Women against Harassment at Workplace, 2010. During KIIs with district administration and other government departments it was highlighted that similar committees” were notified. The DA team met with notified committee heads and members. The respondents shared that these committees are functional and provide support to women staff against any kind of harassment in the office. The district Lodhran committee shared that they have acted against a male staff member against the complaint registered by a female employee and the accused was dismissed from the service based on the committee’s inquiry report.



FIGURE 2: MEETING WITH DEPUTY SECRETARY WDD



FIGURE 3: MEETING WITH OMBUDSPERSON PUNJAB

### 3.5.4 Consultation with Women Working in Government Offices

The women of various cadres working in government departments were consulted and interviewed through KIIs. These government officials include Ombudsperson Punjab, Additional Deputy Commissioner Revenue (ADCR), Assistant Director Land Revenue (ADLR), Assistant Commissioner (AC), Social welfare officers, in-charge Darul-Aman/ women crisis center and in-charge Tahafuz center.

The women were aware of GBV/SEA/SH related laws, rules, and regulations, while the women working in the Revenue Department (RD) were practicing execution of women's property rights on daily basis. The women staff, particularly ADCR, ADLR, and AC have enforced laws related to harassment in the workplace 2010, the Women Protection Bill 2006, the Violence Against Women Act 2016, sexual harassment laws (abuse, rape, and domestic violence), and women's land rights. They directly intervene in land related GBV/SEA/DSH cases and resolve them as a priority. The RD has limited women staff which undermines its capacity to deal with the visiting women who are often vulnerable to GBV/SEA/SH risks in their respective districts.

Although the district Administration has notified harassment committees as per the Harassment at Workplace Act 2010, most of the staff is unaware of these committees and their functions. The CoC was developed but not displayed in land revenue offices. The Arazi record centers have CoC related to land issues that are not specific to risks of GBV/SEA/SH.

The women staff in the land revenue department expressed the need for capacity building of all staff on GBV/SEA/SH, CoC, referral pathways, and grievance redressal mechanism. The complaint management system exists in the department, yet it is not related to GBV/SEA/SH risks. The women working in other departments i.e., social welfare, for instance, have limited knowledge and understanding about the GBV/SEA/SH related laws, regulations, and procedures to handle cases related to GBV/SEA/SH.

The SOPs and code of conduct were available in some of the offices visited and accessible to staff, however, they were not displayed in the office premises for community and visiting women. The GRM system was not available in these offices and the staff didn't know about the system. They may directly complain to higher authorities on complaints related to GBV/SEA/SH. As such, the need was felt to strengthen the capacities of the staff on GBV/SEA/SH laws, regulations, and procedures as well as on GRM.

### 3.5.5 Consultations with NGOs/CBOS

Consultations with local NGOs, CBOs, and CSOs in the project districts were conducted. Local NGOs/ CBOs have a limited understanding of the local issues concerning GBV/SEA/SH, and their ability to access and influence the established redressal mechanisms to create any remarkable change.

About GBV/SEA/SH local NGOs/CBOs have been facing various capacity issues, such as technical expertise, human and financial resources, and coordination with government departments, particularly with law enforcement agencies. In their experience/ views the victims of GBV/SEA/SH cases are always reluctant to report incidents of violence, particularly domestic violence, sexual harassment, and abuse. They highlighted multiple



factors due to which women decide to remain in abusive relationships which include fear of retribution, loss of economic support, concern for the children, emotional dependence, and lack of support from family and friends due to social norms and tradition. Despite the abuse, the social unacceptability of being divorced or separated poses an additional fear that compels them to stay in abusive relationships. Furthermore, denial and fear of social stigma often prevent women from reaching out for help. It was observed that women do not have opportunities for jobs or job security in the project area which increases their vulnerability manifold and thus they are always reluctant to report incidences of GBV/SEA/SH faced by them at workplaces. A list of the NGO/CBOS is enclosed in annex 11.

Women working in the NGOs had some knowledge about the terminologies of GBV/SEA/SH risks and corresponding laws, rules, and regulation regulations, however, they had limited information about different referral pathways. Due to the donors' compulsion, they often conduct different capacity-building sessions of staff on GBV/SEA/ matters. It was shared that women staff working in NGOs also face threats, abuses, and security issues from the accused when they work with GBV/SEA/SH survivors or refer them for legal support or to law enforcement agencies for resolution of issues.



FIGURE5: CONSULTATION WITH WOMEN IN NGOS



FIGURE 6: CONSULTATION WITH WOMEN IN NGOS

### 3.5.6 Consultation with Beneficiary Communities

The women living in the adjoining communities were at a potentially high-risk for GBV/SEA/SH. During the FDGs, several women shared their stories of social, economic, and sexual exploitation and abuse by close family members and male community members. Women also narrated examples of resolving disputes relating to violence against women in the communities at the family level following local customs. Most cases were resolved at the community level with the support of family elders, or with the help of the local NGOs. Most GBV/SEA/SH survivors were found reluctant to seek help from the police, except in the case of extreme domestic violence.

During discussions with divorced and widows, they were found highly vulnerable as they face threats, abuse, and family pressures during their daily activities, family gatherings and other social events. Due to this, they are more dependent on the male family head/ elder and are not able to claim their legal rights including inheritance rights. The elderly women were also dependent on their families on matters related to health, nutrition, mobility, and access to different institutions. They are of the view that as they are most vulnerable, they often face issues of abuse, ignorance, and exploitation.



FIGURE 8: DISCUSSIONS WITH WOMEN BENEFICIARIES

Several concerns were raised during the focused group discussions with adolescent girls gathered at the social welfare office. Girls narrated incidents of harassment and teasing while traveling to educational institutions, bazaars, markets, and vocational training centers. The consultations confirmed that adolescent girls are quite vulnerable and at high risk for potential GBV/SEA/SH risks due to the labor influx in the area.

During consultations with PWDs and Transgender persons<sup>4</sup>, it was assessed that PWD and transgender persons often face discrimination and stigma, which contribute to social exclusion and increase their vulnerability to GBV/SEA/SH. The PWD and transgender persons face unique challenges and vulnerabilities to GBV/SEA/SH risks in the community. PWD faces physical barriers and a lack of accessible infrastructure to access legal services, report incidents, or participate in community discussions about property rights. PWD, especially those with severe disabilities, are more dependent on caregivers, making them more susceptible to GBV/SEA/SH within the caregiver relationship. PWD who face communication challenges, such as those with speech or hearing impairments, may struggle to report incidents of GBV/SEA/SH or seek assistance. The transgender persons narrated that the current legal framework, Transgender Persons Act, 2018 recognizes the gender identity of transgender persons, their right to obtain CNIC (Computerized National ID card), and their right to inherit, however due to objections raised by certain segments of the society, challenging of different sections of the ACT in courts, lack of awareness and other societal constraints create hurdles in obtaining CNIC and property rights and may expose them to potential GBV/SEA/SH risks.

During FGDs with Sikhs, and Christians, the respondent informed the team that in their religion women do not have land rights share so women do not claim their land rights. Further to GBV/SEA/SH related issues, they are equally exposed to different threats, abuses, exploitation, and gender-based violence risks.

The matrix below describes the key findings and recommendations.

<sup>4</sup> One session was done with four transgender persons participated.

Consultation Groups	Findings	Recommendations
Consultation with PMU/PIU-PULSE	<ul style="list-style-type: none"> <li>a) Limited institutional capacity on GBV/SEA/SH understanding and taking risk mitigation</li> <li>b) Misconduct system protocols, and sanctions need strengthening.</li> <li>c) The staff needs to be updated on referral paths ways regarding referring GBV/SEA/SH incidences for different support services.</li> <li>d) GBV/SEA/SH Risk assessments were not conducted with defined frequency.</li> <li>e) Limited staff capacities on reporting and management of GBV/SEA/SH incidences.</li> <li>f) GBV/SEA/SH related complaint handling and reporting protocols need strengthening.</li> <li>g) There was no specific committee for handling GBV/SEA/SH cases referred to by the staff, IPs, workers, and communities.</li> </ul>	<ul style="list-style-type: none"> <li>a) Training of staff of PMU/PIU, contractor, and IPs on national and provincial GBV/SEA/SH policies, risks, issues, Code of conduct, unacceptable conduct toward co-workers, local community members, specifically women and GRM for reporting and response of GBV/SEA/SH incident</li> <li>b) Aligning misconduct protocols with WB and country's prevailing laws and implementing of these protocols at all levels.</li> <li>c) Provision of support and capacity building of PMU/PIU staff on understanding GBV/SEA/SH, reporting, and management.</li> <li>d) Identification/classification of service providers for the provision of services to survivors</li> <li>e) Complaint handling and reporting protocols need to be established.</li> <li>f) formation of a specific committee for handling GBV/SEA/SH cases referred by the staff, IPs, workers, and communities.</li> </ul>



Consultation Groups	Findings	Recommendations
Consultation with Implementing Partners/Contractors	<ul style="list-style-type: none"> <li>a) Lack of understanding of IP staff and management on GBV/SEA/SH, risks, and have not conducted risk assessment with GBV/SEA/SH perspective.</li> <li>b) Although IP staff have signed the code of conduct, they do not know about the code of conduct's specific terms and conditions.</li> <li>c) More training of staff at all tiers is required to sensitize them on GBV/SEA/SH.</li> <li>d) IPs have not developed a GBV/SEA/SH action plan.</li> <li>e) The code of conduct was not available in the local language i.e. Urdu for better understanding of staff and communities.</li> <li>f) The GBV/SEA/SH focal persons were not designated at project sites.</li> <li>g) GBV/SEA/SH incidences reporting mechanisms need to be properly disseminated</li> </ul>	<ul style="list-style-type: none"> <li>a) Staff capacity building on GBV/SEA/SH national. Provincial laws and handling GBV/SEA/SH complaints</li> <li>b) Staff capacity building and implementation of code of conduct at all levels</li> <li>c) Establish a reporting mechanism in case of a breach of the code of conduct by staff.</li> <li>d) All IPs provide guidance /checklist to contractors for developing GBV/SEA/SH action plans.</li> <li>e) The code of conduct must be available in the local language i.e. Urdu for better understanding of staff and communities.</li> <li>f) The GBV/SEA/SH focal persons must be designated at project sites and a committee to be formed for handling GBV/SEA/SH cases.</li> <li>g) Reporting channels to be developed and disseminated at all project sites.</li> </ul>
Consultation with local Communities (women and men)	<ul style="list-style-type: none"> <li>a) Women's rights are generally denied when it comes to ancestral land and property distribution in families, and they are excluded from the ownership as the legal hires which pushes women into a perpetual dependence on male family members.</li> <li>b) Lack of understanding of community especially women, on GBV/SEA/SH terminology and reporting of GBV/SEA/SH specific cases</li> <li>c) Misconceptions about religious and cultural norms contribute to a lack of understanding of gender-equitable property rights. This leads to GBV/SEA/SH of women claiming their</li> </ul>	<ul style="list-style-type: none"> <li>a) The targeted communities need to be sensitized on GBV/SEA/SH issues and reporting mechanisms and reporting channels devised under the MAP.</li> <li>b) Creating awareness among the community (male and female) on the role and responsibilities of different departments for the provision of support services needed on GBV/SEA/SH incidences.</li> <li>c) Preparation of a directory in the local language on referral pathways and services providers for communities. The available services on GBV/SEA/SH should be displayed in respective locations/ project sites.</li> </ul>

Consultation Groups	Findings	Recommendations
	<p>land/property rights in the project districts.</p> <p>d) The targeted women communities were not sensitized to GBV/SEA/SH issues.</p> <p>e) The communities especially women do not know about different departments and their role as GBV/SEA/SH service providers.</p> <p>f) The community was not aware of referral pathway</p>	<p>d) Community awareness session on GBV/SEA/SH for project beneficiaries (both male &amp; female) and they should be made aware of the GRM mechanism for reporting the incidents of GBV/SEA/SH in the project districts</p>
<p>Consultation PWDs, Transgender persons, and Minorities</p>	<p>a) PWDs, transgenders persons, and minorities have been facing multiple problems in reporting the cases of GBV/SEA/ SH to the relevant forums.</p> <p>b) The PULSE project has limited SOPs/COCs to cater to the specific needs of marginalized groups. In the case of PWDs, for instance, physical barriers and lack of accessible infrastructure to access legal services, report incidents, or participate in community discussions about land entitlements and property rights are major impediments.</p> <p>c) Minorities, Sikhs, or Christians for example, have different rules and laws of inheritance. the departments concerned to deal with the issues affecting women’s entitlements and property rights effectively, which is not the case at present.</p>	<p>a) The PWDs, transgender persons, and minorities need to be sensitized on GBV/SEA/SH issues, about the available national and provincial laws on GBV, and reporting mechanisms and reporting channels devised under the MAP.</p> <p>b) Creating awareness among PWDs, transgender persons, and minorities on the role and responsibilities of different departments for the provision of support services needed on GBV/SEA/SH incidences.</p> <p>c) Preparation of a directory in the local language on referral pathways and services providers for communities. The available services on GBV/SEA/SH should be displayed in respective locations/ project sites.</p> <p>d) The training or awareness sessions need to be culturally competent and aware regarding the unique challenges faced by transgender persons, limiting the effectiveness of support services and availability of accessible counseling services, legal aid, and medical support that are sensitive to cultural and identity-specific considerations.</p>

### 3.6 Assessment and Plan for Strengthening Staff Capacity.

Based on the interactions with BOR/PMU/PIU-PLRA DGKA and other relevant implementing institutions, it was observed that although there was a good understanding of the technical aspects of the project including the gender objectives and actions, there is a limited understanding and knowledge about GB/SEA/SH. There is also limited awareness about national and state laws and policies on GBV/SEA/SH. The project is in the process of developing Information, Education, and Communication (IEC) material and training plans. There is a need to provide support to Gender Harassment Committees, staff and GRM on GBV/SEA/SH through tailor-made training and sensitization training workshops on a recurrent basis.



FIGURE 9: STAGES OF GBV/SEA/SH REDRESSAL

Based on the assessment, the plan for strengthening staff capacities should include trainings, awareness/orientation sessions and sensitization workshops for all PMU/PIU-BoR, PLRA staff, Harassment and GRM committee members, project management consultants, contractors/ surveyors, IPs, and all other project partners once they are mobilized.

### 3.7 GBV/SEA/SH Redressal Mechanism

During the consultation with PMU/PIU, DGKA, surveyors, communities, and workers, it was observed that the existing GRMs in place under the project (at PMU/PIU and contractors) have limited capacity to cater to GBV/SEA/SH related complaints and referral pathways. It is recommended to establish a GBV/SEA/SH Complaints Committee (GBVCC) to be made part of the project's GRM system. GRM with respect to GBV/SEA/SH needs to address complaints confidentially and transparently with no personal judgment and impacts (cost, discrimination) for any reports made by project-affected people. Therefore, the proposed grievance redressal mechanisms described hereunder include both complaints and grievances (hereinafter referred to only as 'grievances'). Grievances raised by stakeholders need to be managed through a transparent process, readily acceptable to all segments of affected communities and other stakeholders, at no cost and without retribution. The GRM within existing legal and cultural frameworks, provides an additional opportunity to resolve grievances at the local, project level. Further details on GRM are provided in Chapter 5 of the report.

### 3.8 Code of Conduct (CoC)

During the consultations with stakeholders, it was noted that some of the IPS/Contractors/ Consulting firms developed their CoC and were displayed. There is a need to ensure that all IPs/Contractors/Consultants prepare their GBV/SEA/SH risk action plan and CoC/SOPs for handling the incidents of GBV/SEA/SH. For maximum awareness and to ensure compliance it is recommended to translate code of conduct into Urdu language and display it in office prominent places.

### 3.9 Procurement of IPs/ Contractors/ Consulting firms

During the consultations, it was found that the guidelines of WB for procurement SEA/SH Prevention and Response Measures should be followed while issuing contracts to contractors, IPs/ Contractors/Consulting firms. The code of conduct given in the contract as Form-8, available in Annex-5, should be signed by contractors/ surveyors and consultants. Moreover, the procurement section of the PMU/PIU must ensure the inclusion of CoC and SOPs for GBV/SEA/SH in the contracts of IPs/Contractors/ Consulting firms. Sample Form F is enclosed in Annex-5.

### **3.10 Referral Pathways**

Referral Pathways were established in collaboration with other agencies and service providers like Ombudsperson-Punjab, Women Development Department Lahore, law enforcement agencies, district administration, SWD for effective management of GBV/SEA/SH cases and to facilitate access to services. The PULSE project can adopt the referral pathways, which have several entry points and referrals including the police, traditional/religious/community leaders, psychosocial service providers (CSOs and BOs), Legal Aid committees, Medical/Health facilities, the courts of law, which work to ensure that survivors freely and safely navigate and benefit from well-coordinated services. Additionally, the project should support a protocol that provides a framework of cooperation in response to GBV/SEA/SH survivors' support, incident notification, and referral forms. The pathways will be reviewed by the project in consultation with other service providers to update and reflect available services in the project areas for adoption by contractors/ surveyors, IPs, workers, and community beneficiaries.

**CHAPTER**

**4**

**(Mitigation Action Plan)**

## Chapter 4: Mitigation Action Plan with Proposed Interventions

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This Mitigation Action Plan (MAP) is the outcome of risk and capacity assessment carried out under the project. The purpose of MAP is to identify GBV/SEA/SH risks, proposed mitigation measures, stakeholders, possible service providers and assess their capacity, and document the legal and institutional mechanisms that aid in accessing grievance redressal. The components for a robust and timebound response plan with designated responsibilities are prepared along with accountability & response framework and monitoring & evaluation including re-assessment of risks as and when required throughout the project life. The GBV/SEA/SH risks and capacity assessment key findings also highlight the need to strengthen the capacity of staff i.e. PMU/PIU, contractors/surveyors/IPs/consulting firms on the importance of addressing SEA/SH risks, code of conduct implementation, separate GBVCC and its role and responsibilities, community awareness on GRM, reporting and response mechanism for GBV/SEA/SH risks, engaging stakeholders on redressal of GBV/SEA/SH risks, development of Information and Education and Communication (IEC) material on GBV/SEA/SH, mapping of service providers and development of linkages with departments providing services to GBV/SEA/SH survivors.

### 4.1. Mitigation Action Plan (MAP) Components

The GBV/SEA/SH risk MAP has been prepared to address the risk of GBV/SEA/SH in the project-related work environments and communities where land titling is being carried out. The MAP is based on the key findings of GBV/SEA/SH risks and capacity assessment. The purpose of the MAP is to identify the risks mitigation measures, timelines as well as responsibilities to trigger appropriate actions. The proposed action plan focuses on sensitizing all relevant identified stakeholders and strengthening their capacities to respond and prevent GBV/SEA/SH risks during the implementation of the project. This plan is intended for and applicable to all project PMU/PIU staff, contractors/surveyors/consulting Firms/IPs, and beneficiaries/communities and includes the following components:

#### Component-1: Strengthening Institutional Capacity for GBV/SEA/SH Risk Mitigation and Response

The PULSE project will conduct capacity-building training programs and awareness sessions for PMU/PIU staff, Contractors/Surveyors/ IPs on GBV SEA/SH risks in the project, key elements of the CoC, GRMs, and other monitoring mechanisms to provide safe and ethical reporting systems for people wishing to report cases of GBV/SEA/SH and their linkage with adequate response actors/ service providers. The IPS/contractors and consulting firms will subsequently ensure that their direct workers, sub-contractors, and surveyors are made aware of CoC and GBV/SEA/SH risk issues as part of their induction training. Strengthening coordination and collaboration with other relevant departments and actors to tap into the existing referral system in the project areas for GBV/SEA/SH incidents/ cases. The CoC should be disclosed to the bidders/contractors as part of the bid/contract. The bidders/contractors must commit to adopting it and ensuring that all workers sign it before being allowed to work in the project areas.

In addition, the PULSE project or Gender Specialist will provide support to IPs/contractor/ consulting firms to develop GBV/SEA/SH misconduct response systems, which will apply to the implementation and will ensure organizational responses for misconduct of any worker of the IPs/contractors/ consulting firms. These responses will comply with the relevant PULSE project protocols on the management of GBV/SEA/SH risks and will include the implementation of sanctions for violations of worker CoC. The SOPs on GBV/ SEA/SH misconduct response procedures for the PULSE Project are

attached in Annex-6 of the report, which will ensure organizational responses for misconduct of PMU/PIU staff during the implementation of the project.

### **Component-2: Mapping of Service Providers on GBV/SEA/SH**

The mapping of the existing service providers in the project areas i.e., social welfare department, health department, ombudsperson Punjab, law enforcement agencies, legal aid committees at the district level and their capacity, role, and responsibilities on the provision of services on GBV/SEA/SH as per national and provincial laws, policies, and PULSE project frameworks. This should incorporate an assessment of the capabilities of the service providers to provide quality survivor-centered services including GBV/SEA/SH case management, acting as a victim advocate, and providing referral services to link to other services not provided by the project itself. The service providers' basic information is captured in the service provider directory which is enclosed in Annex-9. It will be disclosed by the project and made available for all staff i.e., PMU/PIU, IPS/Contractor/ Consulting firms, and communities for accessing services related to GBV/SEA/SH. The project will further delineate the project-related referral pathways and protocols based on available information on SEA/SH referral services in the project area. The objective is to enable the provision of quality response services for survivors i.e., case management, safety /protection, medical care, legal aid, and psychosocial support for the victims.

### **Component-3: Communication to Affected Communities on GBV/SEA/SH Risks and GRM**

PULSE is already in the process of setting up a GRM , which will address the complaints received at the project level, it will also be integrated with the Punjab Land Records Authority's (PLRA) system. While establishing the project's GRM, it must be ensured that the system handle is capable of handling GBV/SEA/SH related grievances in accordance with the GBV/SEA/SH GRM protocols provided in this MAP.

Community awareness on GBV/SEA/SH through organizing awareness sessions for project beneficiaries and their legal rights will be provided as part of the project activities and stakeholder engagements. Project beneficiaries should be made aware of the GRM mechanism for reporting the incidents of GBV/SEA/SH. The project will prepare necessary IEC material with the help of GS and disseminate this IEC material to the communities and other stakeholders. Developing strategies for engaging local CSO/CBOs for continuous dialogue and consultations with the community and reporting any incidents of GBV/SEA/SH that may arise during the implementation of the various initiatives of the project.

Information regarding GBV/SEA/SH sensitive communication channels will be designed and disseminated by taking into consideration women's (direct and indirect women workers and project beneficiaries) safety. For instance, information on cards, leaflets, pamphlets, and posters will be distributed in female-only and male-only sessions.

### **Component-4: Code of Conduct for Project Staff**

The PULSE project staff and all Contractors/IPs/Consulting Firms need to ensure that all workers sign a Code of Conduct (CoC). The CoC is prepared and placed in Annex-8 that specifies appropriate behavioral conduct, responsibility, and penalties for non-compliance with GBV/SEA/SH guidelines, among other social misconducts. The PMU/PIU will support the contractors/IPs/Consulting firms to develop CoC with clauses on SEA/SH compliance and ensure that they are enforced and thoroughly followed. The CoC will be translated by the project into local languages and explained to workers in languages that they understand. Communities will also be made aware of the CoC provisions by the contractors, surveyors, IPs, and consulting firms during community awareness sensitization sessions to create awareness of the expected behavior of any project-related worker and mechanism for reporting in case of breach of CoC by the workers under the PULSE project.

## **Component-5: Contract Management and Capacity Building of IPs/Contractor/ Consulting firm**

The pre-bid conferences for all contractors, bidders, and IPs will be held prior to the launch of tenders, to sensitize them to the WB GBV/SEA/SH requirements.

- Development of GBV/SEA/SH action plan and training calendar - the project will develop guidelines and a checklist for contractors/IPs on how to develop a simple and implementable GBV/SEA/SH action plan, which will be included as a tender requirement for high-value contracts.
- Selection and awareness-raising sessions/training programs of contractors - the contractors/IPS will be trained on developing and implementing a GBV/SEA/SH action plan during the initiation phase of the project and onward.
- Development of communication material - the project and particularly the GS in coordination with the communication specialist and GRM specialist will develop communication material to be used by the PMU/PIU, IPS/ Contractors/ Consulting firms to sensitize their workers to GBV/SEA/SH.

## **Component-6: GBV/SEA/SH Risks and Capacity Assessment in Project Areas**

GBV/SEA/SH risk and capacity assessment was conducted in nine (09) districts to respond and prevent, and this risk mitigation action plan is based on the key findings of the assessment during the pilot phase. GBV/SEA/SH action plan will be monitored by the GS. The biannual reports will include updates on the status of the GBV/SEA/SH activities on the project. Under regular M&E of the PULSE project, progress on GBV/SEA/SH response and prevention activities will be incorporated including reassessment of risks if appropriate.

## **Component-7: Establishment of Reporting Protocols**

- The GBV/SEA/SH complaint cases that are reported through the PULSE Project GRM. The GRM Specialist needs to report the cases within 24 hours to the project management and to WB within 48 hours as Per Environment and Social Incidence Reporting Toolkit (ESIRT). The reported incident will be routed to GBVCC. The GRM Specialist will also inform the survivor about referral pathways and available GBV/SEA/SH support services.
- The complaint cases of GBV/ SEA/SH will be reported through different channels of the PULSE GRM if the incident concerns a direct worker or a worker from a contractors/IPs, response options should similarly follow a survivor-centered approach. The IPs/ Contractors/Consulting firms may have in place procedures and processes for managing such cases. In case of non-existence of procedures, the project will provide support to IPs/Contractor/ Consulting firms for establishing processes and procedures.
- If such cases are reported through the local grievance redressal committees, at the project site level. The focal persons will report immediately and directly to the project GRM Specialist at the PMU/PIU level for further action and reporting. Additionally, at the site level focal points from IPS/Contractors/ Consulting firms will inform the survivor about the referral pathways and available GBV/SEA/SH support services.

## **Component-8: GBV/SEA/SH Referral Pathway**

In case, during the implementation of the project, GBV/SEA/SH incident is reported, the GBV/SEA/SH referral system will support survivors in receiving all necessary services which may include safety/ protection, medical care/aid, legal aid, psycho-social counseling, and that cases are reported to the police with the informed consent of the survivor (where required). A survivor has the right to make an informed choice of services. GRM specialists and service providers should be able to provide comprehensive information about existing referral pathways. When the survivor is referred, complete information on services available and which conditions apply should be thorough. Prioritized response actions for GBV/SEA/SH survivors, subject to their consent are:



- Medical examination and treatment of the survivor (where needed)
- Early psychosocial counseling to avoid or reduce trauma for the GBV/SEA/SH survivor.
- Police investigation and protection intervention for physical safety, and social re-integration, where deemed necessary, and with consent of the survivor.
- Access to Justice
- Place of safety/shelter

Sample Survivor Consent Form is attached in Annex -10

### Component-9: Preparation and Display of Signage on GBV/SEA/SH

The preparation and display of signage on GBV/SEA/SH are crucial components in fostering a safe and respectful environment. The creation of informative and visually impactful signage plays a key role in raising awareness, educating individuals, and promoting a culture of zero tolerance for such behaviors. The preparation phase involves careful consideration of content, design, and placement to ensure maximum visibility and effectiveness. Signage should convey clear messages condemning GBV/SEA/SH while also providing information on reporting mechanisms and support services. Utilizing inclusive language and culturally sensitive visuals is essential to ensure that the messages resonate with diverse audiences. Displaying these signs prominently at workplaces, contributes to creating an atmosphere that discourages inappropriate behavior and encourages a collective commitment to preventing and addressing these GBV/SEA/SH issues. Regular updates and reinforcement of the signage can further enhance their impact, fostering an environment where everyone feels respected, safe, and empowered.

### Component-10: Formation of GBV/SEA/SH Complaints Committee (GBVCC)

There will be a (GBVCC) committee at the PMU/PIU level. The objective of such a committee in a workplace is to contribute to the development and implementation of a safe workplace environment on GBV/SEA/SH under the project.

#### 4.1.1 Component-wise GBV/SEA/SH Mitigation Action Plan with Timelines and Responsibilities

S. No	Activity	Actions	Timeline	Responsibility
<b>Component 1: Strengthening Institutional Capacity for GBV/SEA/SH Risk Mitigation and Response</b>				
1	Capacity Building of PMU/PIU and contractors/IPs	Training of staff of PMU/PIU, contractor, and IPs on national and provincial GBV/SEA/SH policies, risks, issues, Code of conduct, unacceptable conduct toward co-workers, local community members, specifically women and GRM for reporting and response of GBV/SEA/SH incidents	Prior to the mobilization of contractors	PULSE, GS
2	Establishment of a misconduct system	Provision of support and capacity building of IPs/Contractors, and survey firms to develop a misconduct response system and sanctions for violation as per WB protocols and prevailing laws	Within one month of signing the contract	PULSE GS, GRM Specialist Legal expert
<b>Component-2: Mapping of service providers on GBV/SEA/SH</b>				
3	Identification/ Classification of service providers for the provision of services to survivors	Formation and publication of a directory of service providers to survivors of GBV/SEA/SH for all project stakeholders.  Assessment of service providers for the provision of services technically, survivor	The services provider's directory was compiled in March 2024.  Service providers directory to be updated	PULSE, GS

S. No	Activity	Actions	Timeline	Responsibility
		center services, case management, and referral services.	throughout the project activities.	
<b>Component-3: Establishment of GBV/SEA/SH channels and procedures for GRM</b>				
4	GRM with key features on reporting of GBV/SEA/SH	Provision of multiple channels for reporting, development of web-based GR system and hotlines, and communicating GRM services at community level for awareness and filing complaints.  Capacity building on key protocols including referral, reporting, and informed consent to handle cases.	In April 2024	PULSE  GRM Specialist, GS, and Legal Expert)
<b>Component-4: Communication to Project's Workforce and project-affected communities on GBV/SEA/SH risks and mechanism</b>				
5	Awareness sessions for the community and development of IEC material	Development of IEC and awareness material on laws, policies, and services for protection and support  Conduction of sessions with communities on GBV/SEA/SH topics, legal rights, laws, policies, reporting mechanisms, and referral pathways.	Community engagement activities will be aligned with a schedule of survey and parcel mapping activity throughout the project period	PULSE, GS CS, and Community Engagement/Social Mobilization Firm.
6	Gender-sensitive channels for communication	Disclosure of gender-sensitive communication, taking women and gender minorities safety measures.  Separate sessions with male, female, and gender minorities.		PULSE/ GS, Community Engagement/Social Mobilization Firm.
7	Code of Conduct for project workers, contractors, and inclusion in contract management by procurement	The signing of the Workers Code of Conduct by all workers working in the office and survey and made available to the public in the project area and identified stakeholders.  Reporting mechanism in case of breach of code of conduct by workers	Commence within one month of mobilization of contractor and subsequently as and when new workers join	PULSE, Procurement Section.
<b>Component-6: Sensitization and Capacity Building of Contractors and Implementers</b>				
8	Conduction of pre-bid meeting	Organization of pre bid meeting with all contractors/bidders/implementers prior to the launch of contracts on sensitization of WB GBV/SEA/SH requirements	Prior to the launch of the contract with bidders, contractors, and implementers	PULSE Procurement Section,
9	Development of GBV action plan	Provision of guidance checklist to contractors/implementers on the development of GBV action plans	After engaging Contractors/IPs	PULSE, GS
10	Training of Contractors	The contractors will be trained on developing and implementing the GBV/SEA/SH action plan	After engaging Contractors/IPs	PULSE, GS
11	Development of training and communication material for contractors and IPs	Development of training and communication material for workers to be used to sensitize on GBV/SEA/SH terminology, sanctions for violation, role and responsibilities of the	After engaging Contractors/IPs	PULSE, GS/ and CS

S. No	Activity	Actions	Timeline	Responsibility
		contractors, incidence reporting mechanism, and referral procedures		
<b>Component-7: Conduct GBV/SEA/SH Risk Assessments at Project Sites</b>				
12	Conduction of GBV/SEA/SH risk assessment at project sites	Conduction of risk assessment for formation of risk mitigation strategies at project sites	During project implementation	PULSE, Contractors/IPs
<b>Component-8: Establishment of Reporting Protocols</b>				
13	SEA/SH reporting protocol	Formation and implementation of SEA/SH reporting protocols to ensure timely and safe reporting of SEA/SH incidences	protocols to be established in March 2024	PULSE, Contractors/ IPs
14	Appointment of GBV/SEA/SH focal points/persons at the project site	The project in collaboration with IPs/Contractors will ensure that an SEA/SH focal point and persons are designated and place at the project site.	Prior to initiating work on-site.	PULSE, Contractors/IPs
15	Reporting through project GRM	Training of GRM concerned staff on reporting GBV/SEA/SH incidences.  Provision of information about available services and support to survivors and referral pathways	As per training calendar, which will be revised every six months and incorporated into E&S biannual training plan	PULSE
<b>Component-9: SEA/SH Referral Pathways</b>				
16	Supporting survivors to receive services	Prioritization of response actions needed for GBV survivors regarding medical, legal, counseling, protection, and shelter	Case to Case basis throughout the project	Service Providers
<b>Component-10: Preparation and Display of Signage on GBV/SEA/SH</b>				
17	Display of signage on GBV/SEA/SH	Preparation of signage against zero tolerance on GBV/SEA/SH  Display of signage at all strategic locations of the project offices at all levels	Throughout Project	PULSE, Contractor/ Consulting firm
<b>Component-11: Formation of GBV/SEA/SH Complaint Committee</b>				
18	Formation of GBVCC and capacity building	Formation of GBVCC with clear roles and responsibilities at PMU/PIU, contractors, and IPs level and developing GBVCC capacities to address issues and problems reported by workers, and co-workers against GBV/SEA/SH	In April 2024.  Capacity building as per biannual E&S training plan	PULSE, Contractor/ Consulting Firm
<b>Component-12: Finalization of the Accountability and Response Framework</b>				
19	Development of an accountability matrix	Development of a matrix to articulate responsibilities, for verification, investigation/overall management of cases within IPs/Contractors	In April 2024	PULSE, GS
20	Handling of GBV/SEA/SH cases	Capacity building of IPs/Contractors on handling of GBV/SEA/SH cases, reporting, and sanctions on violation of workers' code of conduct.	As per the training calendar, which will be revised every six months and incorporated into E&S biannual training plan	PULSE, GRM Specialist, GS

S. No	Activity	Actions	Timeline	Responsibility
21	Formation of action plans for timely assistance	All IPs/contractors are committed on provision of timely assistance to survivors to comply with all timelines for actions laid out in the action plan.  Liaison with complainants and the investigator.	Prior to the mobilization of the contractors	PULSE, GS, and GRM staff
22	Awareness and capacity building on sanctions	Capacity building and awareness raising of IPs/contractors on sanctions, Acts of SEA/SH, and preventive measures, allegations and corrective actions.  Specific sanctions as per the type of violation will be developed, communicated, and implemented.	Prior to commencement of work and refresher trainings during project life	PULSE, GS, IPs gender focal persons
23	Monitoring & Evaluation	GBV/SEA/SH action plans will be monitored by a Gender Specialist. Biannual reports will include updates on the status of the GBV/SEA/SH activities on the project.  Under regular M&E of progress on SEA/SH prevention and response activities including reassessment of risks as appropriate.  Monitoring of GRM for SEA/SH complaints	Biannually	PULSE, Contractors/ Consulting Firms
24	Linkages Development	Strengthen institutional linkages with other departments (Ombudsperson-Punjab, police, violence against women centers working under the Social Welfare Department, local NGOs/CBOs) and response actors for GBV/SEA/SH risk mitigation	Linkages developed alongside community engagement activities	PULSE

## 4.2 Responsibility /Accountability Response Framework

The Accountability and Response Framework includes details of how allegations of GBV/SEA/SH incidents will be handled (investigation procedures) and disciplinary action for violation of the CoC by the project workers. The framework aims to create a safe and conducive environment for all workers while addressing the issues related to harassment, discrimination, and violence/abuse based on gender that may arise during the implementation of the project. The Accountability and Response Framework should include at minimum:

### 4.2.1 GBV/SEA/SH Complaint Handling Procedures

GBV/SEA/SH handling procedures may vary depending upon the nature of the incidents/ cases from district to district, department to department, and IPs/Contractors and consulting firms under the PULSE project. The following procedures are to be undertaken to handle allegations:

#### 1. Receiving Complaint

- A complaint received through any reporting channel provided by the project (email, Landline number, written, web portal, social media channels) will be immediately registered in the project GRMIS and referred to the GBVCC.

## **2. Immediate Response:**

- Ensure the safety and well-being of the survivor.
- Offer immediate support, such as counseling services (if required).
- Encourage the survivor to seek medical /psychosocial counseling attention if needed.

## **2. Reporting:**

- Clearly outline the reporting process within the PULSE project or its IPS/Contracts/Consulting Firms.
- Report the incident to GBVCC promptly within 24 hours. PIU is to inform the World Bank within 48 hours of the incident as per the World Bank's "Environmental and Social Incident Response Toolkit" (ESIRT).
- Maintain confidentiality while still fulfilling reporting obligations.

## **3. Documentation:**

- Document the details of the allegation, including the date, time, location, and people involved as per the World Bank's ESIRT.
- Record the survivor's account of the incident, ensuring accuracy and sensitivity.

## **4. Investigation:**

- Initiate a thorough and impartial investigation into the allegations.
- Involve relevant committees such as IC/GBVCC, and legal/ external experts if necessary.
- Respect the rights of all parties involved.

## **5. Disciplinary Action:**

- If the investigation substantiates the allegations, take appropriate disciplinary action against the perpetrator/ workers for violation of the CoC.
- For IPs/Contractors/ Consulting Firms, any failure to take preventive measures against sexual exploitation or abuse, to investigate allegations thereof, or to take corrective action, constitutes grounds for termination of the Agreement or Contract with the Project.
- Follow PULSE project policies/strategies/ SOPs and legal requirements in addressing the situation.

## **6. Prevention and Training:**

- Implement preventive measures, such as awareness campaigns/ sessions and training programs, to create a safer work environment.
- Educate employees or members about GBV/SEA/SH, its impact, and the importance of reporting under the PULSE project.

## **7. Legal Compliance:**

- Ensure compliance with provincial/ national laws and regulations related to GBV/SEA/SH.
- Cooperate with law enforcement authorities/ agencies if necessary.

## **8. Confidentiality:**

- Safeguard the confidentiality of the survivor and the investigation process.
- Share information only with those directly involved in the resolution process.

## **9. Follow-Up:**

- Monitor the well-being of the survivor after the resolution of the case.
- Evaluate the effectiveness of policies and procedures and make improvements as and when needed.

### **4.2.2 Procedures and protocols for the provision of assistance/services and support**

The proposed procedures and protocols aim to elaborate a common set of norms and standards based on existing frameworks of the PULSE project to strengthen a coordinated, system-wide approach to the provision of assistance, services, and support, which prioritizes the rights and dignity of GBV/SEA/SH

victims, regardless of the affiliation of the alleged perpetrator. Efforts are being made to align this approach with the PULSE project efforts to prevent and respond to GBV/SEA/SH and consider established good practices to address issues/cases that may arise during the implementation of the project. The protocols are aligned with Sustainable Development Goal (SDG)-5 on achieving gender equality and the empowerment of women and girls, including the elimination of all forms of violence against women and girls in the public and private spheres. The protocols are also aligned with SDG-16 to end all forms of violence against children and promote peaceful and inclusive societies, including access to justice for all. The protocols are developed with the overall objective of providing services and support for survivors that are timely, confidential, and survivor-centered and protect survivors from stigma and retaliation, the following procedures and protocols should be considered:

- a. Awareness raising among all staff of the project and its stakeholders (IPS, contractors/consulting firms) about GBV/SEA/SH services available for survivors and the referral pathways available to connect survivors to multiple services in the project areas.
- b. Ensure that survivors/victims of GBV/SEA/SH receive prompt and coordinated response from service providers under the PULSE project.
- c. Ensure that assistance and support for victims of GBV/SEA/SH is provided in a holistic, integrated manner with the support of a designated staff/ specialist where feasible and/or service provider with the necessary expertise and capacity.
- d. Ensure that existing policies and agreed procedures of the PULSE project are followed with maximum opportunity for the provision of support services to survivors/victims and prosecution of perpetrators (if any).
- e. Ensure that standards of confidentiality, information sharing, and recording of sensitive information are strictly followed.
- f. Review the existing M&E framework of the PULSE project and incorporate indicators for monitoring and evaluation of services offered to survivors of GBV/SEA/SH based on agreed priority areas of interventions in the targeted areas.
- g. Ensure that assistance and support services are provided on a case-to-case basis, in accordance with the needs of the victim of GBV/SEA/SH under the PULSE project. Common services/ support for victims of GBV/SEA/SH include:
  - **Safety and Protection:** This entails the provision of immediate safety/protection to address the risk of retaliation, possible breaches of confidentiality, or other further violence against the victim. The safety response should set out roles and responsibilities, as well as capacities of designated staff/specialists or relevant actors. Subject to a risk- assessment, and based on the victims' consent and best interest, the safety or protection plan may include relocation support where necessary and appropriate.
  - **Medical Care:** This includes the provision of necessary medical care for the victim of GBV/SEA/SH. In cases of sexual abuse, this includes informing victims about the importance of seeking medical care within 72 hours and providing the necessary referral to services.
  - **Psychosocial Support:** This comprises the provision of basic psychosocial support, including psychological first aid, and psychosocial counseling to assist victims, and facilitating referrals to more specialized mental health care, if required.
  - **Legal Services:** This entails the referral by the PULSE project to providers of legal assistance if desired by the victim of GBV/SEA/SH.

### 4.3 Monitoring of Action Plan

- a. The project will have a third party with a mandate for monitoring the contractors/IPs/consulting firms for implementation of their GBV/SEA/SH Plans.
- b. Annual monitoring of the Action Plan will be carried out by a third-party monitoring firm. The review will focus on:
  - Ensuring that all activities proposed by the project have been undertaken and/or are on track.

- Monitoring and reporting on the effectiveness of the implementation of the contractor GBV/SEA/SH Plans.
  - Reporting on progress on all activities and reassessment of risks, monitoring of the situation as appropriate.
- c. **Non-compliance:** Where quarterly reviews identify non-compliance with the contractor GBV/SEA/SH Plans, the matter will be reported to the PULSE Project, Gender specialist.
- d. Based on the regular monitoring recommendations, the project will seek clarification from the respective IP or contractor and jointly develop a corrective action plan. Serious cases can lead to the termination of a contract with the contractor/IP.
- e. Project will monitor the GBV/SEA/SH sessions for IPs and contractors regarding the Code of Conduct obligations and awareness-raising activities to the community is in place. The information gathered will be monitored and reported to the WB as per requirement.

**CHAPTER**

**5**

**(Grievance Redressal  
Mechanism and GBV Training)**



## Chapter 5: Grievance Redressal Mechanism (GRM) and GBV/SEA/SH Training Calendar

### 5.1 Assessment of Existing GRM and Proposed Project GRM for GBV/SEA/SH

During the assessment with PMU/PIU, DGKA, surveyors, communities, and workers, it was observed that the existing GRMs in place under the project (at PMU/PIU and contractors) have limited capacity to cater to GBV/SEA/SH related complaints and referral pathways. In addition to the existing GRM system, it is recommended that GBV/SEA/SH sensitive protocols be incorporated in the project's GRM to address complaints confidentially and transparently with no personal judgment and impacts (cost, discrimination) for any reports made by project affected people. Therefore, the proposed grievance redressal mechanisms described hereunder include both complaints and grievances (hereinafter referred to only as 'grievances'). Grievances raised by female workers (all categories of workers including direct and indirect workers co/workers) hired under the PULSE need to be managed through a transparent process, readily acceptable to all segments of affected communities and other relevant stakeholders, at no cost and without retribution. The GRM within existing legal and cultural frameworks, will provide an additional opportunity to resolve grievances related to GBV/SEA/SH at the project level. The key objectives of mainstreaming / integrating GBV/ SEA/SH into project GRM are as under:

- a. Record, categorize, and prioritize the grievances on GBV/SEA/SH.
- b. Resolve the GBV/SEA/SH grievances/ cases via investigation with relevant stakeholders (and inform those stakeholders of the solutions)
- c. GBV/SEA/SH cases warranting legal/criminal proceedings may be forwarded to the relevant authority for different administrative actions after getting the consent of the survivor.

The below figure no.5.1 explains the basic steps in a grievance procedure.



Moreover, during the assessment, it was observed that the committees, i.e., Grievance Redress Committee and Staff Grievances Redressal Committee, were already formed under the project to

handle grievances. An independent/ separate GBVCC will handle complaints related to GBV/SEA / SH incidents/ cases that may arise due to the implementation of the PULSE project.

## **5.2 Proposed GBV/SEA/SH GBVCC into PULSE Project GRM Mechanism**

As the PULSE has GRM under preparation and is expected to be fully functional in 2024, GBV/SEA/SH elements need to be integrated into project GRM to address GBV/SEA/SH cases in the project. In this connection, a GBVCC should be formed. The details structure/composition of the proposed GBVCC is outlined below:

### **5.2.1 Composition of GBVCC**

The following composition is recommended for GBVCC.

- Chair (Project Director)
- Legal Expert
- GBV/Gender Specialist
- GRM Specialist
- Procurement Specialist
- Co-Opted member

There should be 50% women representation in GBVCC, however, since all members of the notified committees are designated personnel and can be male or female, opted members wherever required will be preferably women to ensure adequate female representation.

### **5.2.2 Responsibilities of GBVCC**

The objective of GBVCC is to provide a safe and conducive environment for female workers/ co-workers to be hired directly by the project or either by contractors/survey firms/ IPs and community workers. The committee has the following responsibilities.

- GBVCC will keep GBV/SEA/SH allegation reports confidential.
- Ensure that GBV/SEA/SH risks are reported, addressed, and prevented through a survivors-centered approach.
- Establish confidential and accessible reporting mechanisms for incidents of GBV/SEA/SH
- Ensure that employees feel safe and supported when reporting incidents.
- Refer the survivor immediately to the GBV/SEA/SH service providers (if required)
- The GBVCC will carry out an impartial investigation to determine the authenticity and severity of the complaint. If the allegations are established, the committee will move forward with disciplinary proceedings.
- Ensure that appropriate disciplinary measures are taken against perpetrators in accordance with the organization's policies and prevailing laws.
- Foster a workplace culture that promotes respect, equality, and zero tolerance for gender-based violence.
- Collect and analyze data on incidents of gender-based violence in the workplace.
- Generate regular reports to identify trends and areas for improvement.
- Collaborate with external organizations, such as local support services, and NGOs, to enhance the workplace response to SEA/SH.
- Emphasize the importance of maintaining confidentiality and privacy throughout the grievance resolution process.

### **5.2.3 Complaint Types and Reporting Channels/Platforms**

- Types of GBV/SEA/SH risks/ complaints that may be reported are given below:

- Physical violence/ abuse and harm during the implementation of the project activities at workplaces or project sites.
- Sexual violence/sexual contact or bullying from the male colleagues of project/contractors/IPs/Consultants at workplaces or project sites.
- Economic abuse e.g. unequal wages and controlling financial resources to exploit or limit financial benefits of women workers of all categories hired under the project.
- Abuse of power for sexual purposes at workplace and project sites.
- Exchanging goods, services, or favors for sexual acts.
- Retaliation for rejection in the workplace because of rejecting sexual advances or reporting harassment.
- Unfair treatment, including biased decision-making, unequal pay, or denial of opportunities.
- Display/Sharing of sexually explicit material.
- Online harassment through electronic communication channels, including emails, social media, or other digital platforms.

#### 5.2.4 Stages of Complaint Process

- Complaints received from uptake channels from staff of PMU/PIU/contractors/ implementing partners and surveyors through mail, email, telephone, WhatsApp, and other social media channels.
- Sorting and processing grievances/complaints/queries for follow-up and investigation.
- The GBV/SEA/SH complaints will be referred to the GBVCC.
- GBVCC will investigate with relevant stakeholders for resolving GBV/ SEA/SH complaints.
- Assessing and reporting after getting responses from respective departments PMU/PIU/contractors/ implementing partners and surveyors to the higher management of the concerned office.
- Responding to complainants as and when directed/ required.
  - a) Track and document efforts at grievance/dispute resolution and their outcomes.
  - b) Attainment of satisfactory report from complainants after resolving the issue
  - c) Forwarding GBV/SEA/SH cases warranting further action to relevant authorities' agencies (police, court, and ombudsperson and social welfare department, etc.) after obtaining informed consent of the survivor.
  - d) Monitoring, documentation, and closure of complaints with log
  - e) Getting feedback for improvement in handling and registration of complaints
  - f) Developing and ensuring a timeline with responsibilities to handle and closure of complaints.
  - g) In the event where complainant is not satisfied with the decision, she/he can appeal within seven (7) working days. The appeal will be presented to the Staff Grievance Redressal Committee of PMU/PIU.

### 5.3. Training / Awareness Sessions on GBV/SEA/SH

Based on key findings of GBV/SEA/SH risk assessment, a Training and Awareness Session Calendar along with resource persons is proposed in the matrix given below. DAs will conduct 3 training workshops and 9 awareness sessions for the community as part of this contract /assignment. The training and awareness sessions will be arranged with different stakeholders and communities where land surveys and mapping will take place to hear from the communities on potential project risks and inform them about the GBV/SEA/ SH risk prevention and reporting mechanism of the project.

#### 5.3.1 Category-wise Training / Awareness Sessions Calendar

Calendar of Proposed Training/ Awareness sessions with Resource Persons

Group	Duration/ Modality	Frequency	Proposed Sessions and Contents	Resource Persons
PMU/PIU staff	One-day orientation program on GBV. PowerPoint presentations, oral Discussions, sharing of best practices, and group activities	Every 3 months during the project life	<p>Introduction on GBV, SEA, and SH. Identified GBV risks in the project.</p> <ul style="list-style-type: none"> <li>• Working with contractors to prevent SH in the workplace (as well as within the agency and the contracting firms) and other forms of GBV in the project-affected communities (for example, through CoCs).</li> <li>• Strengthening GRMs and other monitoring mechanisms to provide safe and ethical reporting systems for people wishing to report cases of GBV and their linkage with adequate response actors.</li> <li>• Understanding of the roles and responsibilities of the GBVCC and the Accountability and Response Framework.</li> <li>• Effective implementation of the action plan and sanctions for violation as per WB protocols.</li> <li>• Available Service providers working on GBV in the area and other referral pathways.</li> </ul>	<ul style="list-style-type: none"> <li>• Project Gender and GRM specialist</li> <li>• Gender/GBV/SEA/SH Experts</li> <li>• Provincial Ombudsperson Punjab</li> </ul>

<ul style="list-style-type: none"> <li>• Contractor/IPs/Consulting firms/Surveyors</li> </ul>	<ul style="list-style-type: none"> <li>• 1-day orientation program on GBV.</li> <li>• PowerPoint presentation</li> <li>• Oral Discussions, case studies of best practices, and Group discussions/work.</li> </ul>	<ul style="list-style-type: none"> <li>• One month after contractors are engaged</li> <li>• After every 3 months during project life</li> </ul>	<ul style="list-style-type: none"> <li>• What constitutes GBV, SEA and SH.</li> <li>• National, Provincial, and Project’s guidelines on SH</li> <li>• Available Service providers working on GBV in the area and other referral pathways.</li> <li>• Strengthening GRMs and other monitoring mechanisms to provide safe and ethical reporting systems for people/victims who want to report cases of GBV/SEA/SH and their linkage with adequate response actors.</li> <li>• Key elements of the CoC,</li> <li>• Strengthening and monitoring of the GBV/SEA/SH GRM systems and reporting and response protocols.</li> <li>• Communication skills</li> <li>• GBV/SEA/SH Risks for female surveyors.</li> </ul>	<ul style="list-style-type: none"> <li>• DA Gender/GBV/SEA/SH Expert</li> <li>• Provincial Ombudsperson</li> <li>• Project E&amp;S team</li> </ul>
<ul style="list-style-type: none"> <li>• Community beneficiary members</li> </ul>	<ul style="list-style-type: none"> <li>• One-day orientation. PowerPoint presentations</li> <li>• oral discussions and group activities</li> </ul>	<ul style="list-style-type: none"> <li>• After every 3 months during project life</li> </ul>	<ul style="list-style-type: none"> <li>• Explaining GBV, SEA, and SH in the context of the project, including identified GBV risks and hotspots.</li> <li>• Awareness of the key mitigation strategies and GRM mechanisms for GBV/SEA/SH incidents and response.</li> </ul>	<ul style="list-style-type: none"> <li>• DA key Gender/GBV/SEA/SH Experts</li> <li>•</li> </ul>

## Annex-1: Work Plan

Risk Assessment for Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), Preparation of a Mitigation Action Plan, and Provision Of SEA/SH Prevention/Awareness Trainings.

1. District Lodhran				
	From	To	Activity	Stakeholders
Thursday Oct 19,2023	9:30 AM	10:30 AM	KII	District Administration (DC) office
	10.45 AM	11:30 PM	KII	Local Government/Community Development Department
	11:45 AM	12:30 PM	KII	District Revenue Office/ Arazi Record Center
	12: 45 PM	1:30 PM	KII	Law Enforcement Agencies
	2:00 PM	2:30 PM	KII	Social Welfare Department
	2:30 PM	3:15 PM	KII	Women Crises Centre/ NGOs working on the Property Rights of women
	3:30 PM	5:00 PM	FGD	Local Government Representatives / CBOs/ local NGOs/Community
2. District Khanewal				
Friday Oct 20, 2023	9:30 AM	10:30 AM	KII	District Administration (DC) office
	10.45 AM	11:30 PM	KII	District Revenue Office
	11:45 AM	12:30 PM	KII	Arazi Record center
	12:45 PM	1:30 PM	KII	Social Welfare department
	2:00 PM	2:30 PM	KII	Law enforcement Agencies
	2: 30 PM	3: 15 PM	KII	Local Government Authorities
	3:30	4: 30 PM	FGD	Legal Aid and Human Rights Organizations If available
3. District Sahiwal				
Saturday Oct 21, 2023	9:15 AM	10:00 AM	KII	District Administration (DC) office
	10:15 AM	11:00 PM	KII	District Revenue Office
	11:15 AM	12:00 PM	KII	Arazi Record center
	12:30 PM	1:30 PM	KII	Social Welfare department
	2:00 PM	2:30 PM	KII	Women welfare department
	2:30 AM	4:00 PM	KII	Local Government/ Community Development Department
	4:00 PM	4:45 PM	FGD	CBOs/ local NGOs/Community
Monday Oct 23, 2023	9:15 AM	10:00 AM	KII	District Administration (DC) office
	10:15 AM	11:00 PM	KII	District Revenue Office / Arazi Record Center
	11:15 AM	12:00 PM	KII	Legal Aid and Human Rights Organizations/ Women's and Gender Equality Organizations
	12:30 PM	1:30 PM	KII	Social Welfare department / Violence against women center
	2:00 PM	2:30 PM	KII	Law enforcement Agencies/District Bar
	2:30 AM	4:00 PM	KII	Multan Development Authority
	4:00 PM	4:45 PM	FGD	CBOs/ local NGOs/Community
5. District Lahore				
Tuesday Oct 24, 2023	9:30 AM	10:30 AM	KII	PMU-BOR &PIU-PLRA
	10.45 AM	11:30 PM	KII	Directorate of Katchi Abadis GoPunjab


	11:45 AM	12:30 PM	KII	District Administration (DC) office
			KII	Local Government/Community Development Department
	12: 45 PM	1:30 PM	KII	Women Development Department, Punjab
	2:00 PM	2:30 PM	KII	Ombudsman Person on Women Property Rights, Govt. of the Punjab
	2:30 PM	3:15 PM	KII	Commission on the Status of Women (SCSW)
	3:15 PM	4:00 PM	FGD	Contractors/ Surveyors and IPs
	4:00 PM	5:00 PM	FGD	Community
<b>6. District Nankana Sahib</b>				
Wednesday Oct 25, 2023	9:30 AM	10:30 AM	KII	District Administration (DC) office
	10.45 AM	11:30 PM	KII	District Revenue Office
	11:45 AM	12:30 PM	KII	Arazi Record center
	12:45 PM	1:30 PM	KII	Social Welfare department
	2:00 PM	2:30 PM	KII	Local Government/ Community Development Department
	2: 30 PM	3: 15 PM	FGD	Legal Aid /Law Enforcement and Human Rights Institutions/Organizations
	3:30	4: 30 PM	FGD	Community
<b>7. District Hafizabad</b>				
Thursday Oct 26, 2023	9:15 AM	10:00 AM	KII	District Administration (DC) office
	10:15 AM	11:00 PM	KII	District Revenue Office / Arazi Record Center
	11:15 AM	12:00 PM	KII	Social Welfare department
	12:30 PM	1:30 PM	KII	Women crisis Centre
	2:00 PM	2:30 PM	KII	Local Government/ Community Development Department
	2:30 PM	4:00 PM	FGD	CBOs/NGOs/Local Leaders working on GBV
<b>8. District Rawalpindi</b>				
Monday, Tuesday Oct 30- 31, 2023	9:30 AM	10:30 AM	KII	District Administration (DC) office
	10.45 AM	11:30 PM	KII	Directorate of Katchi Abadis
	11:45 AM	12:30 PM	KII	Local Government/Community Development Department
	12: 45 PM	1:30 PM	KII	Women Development Center
	2:00 PM	2:30 PM	KII	Rawalpindi Development Authority/ Punjab Housing and Town Planning Agency (PHATA)
	2:30 PM	3:15 PM	KII	Arazi Record Centre
	3:15 PM	4:00 PM	FGD	IPs & Surveyors
	4:00 PM	5:00 PM	FGD	Community
<b>9. District Khushab</b>				
Friday Oct 27, 2023	9:30 AM	10:30 AM	KII	District Administration (DC) office
	10.45 AM	11:30 PM	KII	District Revenue Office /Registrar
	11:45 AM	12:30 PM	KII	Arazi Record center
	12:45 PM	1:30 PM	KII	Social Welfare department
	2:00 PM	2:30 PM	KII	District Women Protection Committee

## Annex-2: Details of Stakeholders Consultation

Date	Location	Activity	Stakeholders
19-10-2023	Lodhran	Key Informant Interviews	District Administration, Local Government, and Community Development Department, Law enforcement agencies, Social welfare department
		Focus Group Discussions	Local CBOs/NGOs/ members of Dar-ul-Aman, Adolescent Girls
20-10-2023	Khanewal	Key Informant Interviews	District Administration, Arazi Record Centre, Local Government and Community Development Department, Law enforcement agencies, social welfare department
		Focus Group Discussions	Local CBOs/NGOs/ community members
21-10-2023	Sahiwal	Key Informant Interviews	District Administration, Arazi Record Centre, Local Government and Community Development Department, Law enforcement agencies, social welfare department
		Focus Group Discussions	Community members/Members of the Women Crisis Centre
23-10-23	Multan	Key Informant Interviews	District Administration, Arazi Record Centre, Multan Development Authority, Ombudsperson-Multan, Local Government and Community Development Department, Law enforcement agencies,
		Focus Group Discussions	social welfare department, Transgender, Person with Disability, Members of WAVC Centre
24-10-23	Lahore	Key Informant Interviews	PMU-PULSE, District Administration, Ombudsperson-Punjab, Status of Women Development Department GoPunjab, Directorate General of Katachi Abadis.
25-10-2023	Nankana Sahib	Key Informant Interviews	Land record officer, Deputy Director ADC(G), Assistant Commissioner (AC), Additional Deputy Commissioner Revenue
		Focus Group Discussions	Community, CBOs/NGOs Land revenue staff of ARC and Tehsil office
26-10-2023	Hafizabad	Key Informant Interviews	District Administration, Local Government, and Community Development Department, Social Welfare Department, Education Department
		Focus Group Discussions	Minorities/PWD, Community
27-10-2023	Khushab	Key Informant Interviews	District Administration, Local Government, and Community Development Department, Social welfare department
		Focus Group Discussions	Mix groups (Minorities, PWD, and social workers)
30-10-2023 31-10-2023	Rawalpindi	Key Informant Interviews	District Administration, Local Government, and Community Development Department, Social Welfare Department
	Key Informant Interviews	Assistant Commissioner (AC), Service Center In Charge (SCI), Assistant Director Land Record (ADLR), Additional Deputy Commissioner Revenue, DG RDA, DSP HQ – Police, Assistant Director (PHATA) IPs	



# Annex-3: PULSE Project Notification issued by PMU, Board of Revenue, Punjab




Project Management Unit  
Punjab Urban Land Systems Enhancement  
Board of Revenue, Punjab  
Date: 05-05-2023

**NOTIFICATION**

No. PMU(BOR)/HR-N/2023/18. The Competent Authority, Punjab Urban Land System Enhancement (PULSE), Board of Revenue, Punjab has been pleased to constitute the "Inquiry Committee – for Protection against Harassment of Women at the Workplace" in pursuance of "The Protection against Harassment of Women at the Workplace Act, 2010" for the project titled, "Punjab Urban Land Systems Enhancement", Board of Revenue, Punjab, comprising of the following:

Sr. No.	Designation	
i	Financial Management Specialist-PIU-PLRA	Chairman
ii	CRM Specialist	Member
iii	Gender Specialist	Member

Issued with the approval of the Competent Authority


  
 05/05/2023  
 Human Resource Manager

**No. & Date Event:**  
A copy is forwarded for information to the:-

1. Project Director, PMU-PULSE, BOR, Punjab.
2. Project Coordinator, PIU-PLRA, BOR, Punjab.
3. All officer/official, PMU-PULSE/PIU-PLRA, BOR, Punjab.

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19 Aibak Block, Garden Town, Lahore.




No. PMU(BOR)/HR-OD/2023/19  
Project Management Unit  
Punjab Urban Land Systems Enhancement  
Board of Revenue, Punjab  
Date: 05-05-2023

**OFFICE ORDER**

The Government of Punjab has enacted Punjab Protection Against Harassment of Women at Workplace Act, 2010 to provide protection and safety to women against harassment at workplaces. Under this Act, the PULSE project has constituted a three-member Inquiry Committee to address all issues related to workplace harassment.

2. Furthermore, in the Schedule of the Act there is a Code of Conduct for workplaces (Annex-A) which provides a guideline for behavior of all employees, including management, and the owners of an organization to ensure that a work environment is free of harassment and intimidation.
3. Keeping the aforementioned in view the said code of conduct is being circulated among the project staff with the directions to adhere to these guidelines in letter and spirit throughout the duration of the project to ensure safe working environment for women.

Issued with the approval of the Competent Authority

  
 Human Resource Manager

**No. & Date Event:**  
A copy is forwarded for information to the:-

1. Project Director, PMU-PULSE, BOR, Punjab.
2. Project Coordinator, PIU-PLRA, BOR, Punjab.
3. All officer/official, PMU-PULSE/PIU-PLRA, BOR, Punjab.

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158-A, Abu Bakar Block, New Garden Town, Lahore.

"Annex-A"

*Schedule*  
[See sections 2(c) and 11]

**CODE OF CONDUCT FOR PROTECTION AGAINST HARASSMENT OF WOMEN AT THE WORKPLACE**

Whereas it is expedient to make the Code of Conduct at the Workplace etc to provide protection and safety to women against harassment it is hereby provided as under:

- (i) The Code provides a guideline for behavior of all employees, including management, and the owners of an organization to ensure a work environment free of harassment and intimidation;
- (ii) "Harassment" means any unwelcome sexual advance, request for sexual favors or other verbal or written communication or physical conduct of a sexual nature, or sexually demeaning attitudes, causing interference with work performance or creating an intimidating, hostile or offensive work environment, or the attempt to punish the complainant for refusal to comply to such a request or is made a condition for employment;  
The above is unacceptable behavior in the organization and at the workplace, including in any interaction or situation that is linked to official work or official activity outside the office.

**Explanation:**  
There are three significant manifestations of harassment in the work environment:

- (a) **Abuse of authority**  
A demand by a person in authority, such as a supervisor, for sexual favors in order for the complainant to keep or obtain certain job benefits, be it a wage increase, a promotion, training opportunity, a transfer or the job itself.

- 11 -

**(b) Creating a hostile environment**

Any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature, which interferes with an individual's work performance or creates an intimidating, hostile, abusive or offensive work environment.

The typical "hostile environment" claim, in general, requires finding of a pattern of offensive conduct, however, in cases where the harassment is particularly severe, such as in cases involving physical contact, a single offensive incident will constitute a violation.

**(c) Retaliation**

The refusal to grant a sexual favor can result in retaliation, which may include limiting the employee's options for future promotions or training, distorting the evaluation reports, generating gossip against the employee or other ways of limiting access to his/her rights. Such behavior is also a part of the harassment.

- (iii) An informal approach to resolve a complaint of harassment may be through mediation between the parties involved and by providing advice and counseling on a strictly confidential basis;
- (iv) A complainant or a staff member designated by the complainant for the purpose may report an incident of harassment informally to her supervisor, or a member of the Inquiry Committee, in which case the supervisor or the Committee member may address the issue at her discretion in the spirit of this Code. The request may be made orally or in writing.

(i) If the case is taken up for investigation at an informal level, a senior manager from the office or the head office will conduct the investigation in a confidential manner. The alleged harasser will be approached with the intention of resolving the matter in a confidential manner;

(iv) If the incident or the case reported does constitute harassment of a higher degree and the officer or a member reviewing the case feels that it needs to be pursued formally for a disciplinary action, with the consent of the complainant, the case can be taken as a formal complaint.

(v) A complainant does not necessarily have to take a complaint of harassment through the informal channel. She can launch a formal complaint at any time;

(vi) The complainant may make formal complaint through her exchange, supervisor, CBA nominee or worker's representative, at the case may be, or directly to any member of the Inquiry Committee. The Committee member approached is obligated to initiate the process of investigation. The supervisor shall facilitate the process and is obliged not to interfere or obstruct the inquiry.

(vii) Assistance in the inquiry procedure can be sought from any member of the organization who should be contacted to assist in such a case;

(viii) The employer shall do its best to temporarily make adjustments so that the accused and the complainant do not have to interact for official purposes during the investigation period. This would include temporarily changing the office, in case both sit in one office, or taking away any extra charges over and above their normal which may give one party an edge over the other's job conditions. The employer can also decide to end the accused (in leave, or suspend the accused) in accordance with the applicable procedure for dealing with the cases of misconduct, if required.

(xi) Retaliation from either party should be strictly monitored. During the process of the investigation work, evaluation, daily duties, reporting structure and any parallel inquiries initiated should be strictly monitored to avoid any retaliation from either side;

(xii) The harassment usually occurs between colleagues when they are alone, therefore usually it is difficult to produce evidence. It is strongly recommended that staff should report an offensive behavior immediately to someone they trust, even if they do not wish to make a formal complaint at the time. Although not reporting immediately shall not affect the merits of the case; and

(xiii) The Code lays down the minimum standards of behavior regarding protection of women from harassment at workplace etc. but will not affect any better arrangement that an organization may have developed nor will it bar the grant of protection that employees working in an institute may secure from their employers through negotiation.



### Focus Group Discussion (FGD)

Risk Assessment for Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sextual Harassment (SH), Preparation of a Mitigation Action Plan, and Provision of GBV/SEA/SH Prevention / Awareness Trainings

UN Women

Date	24- Oct - 2018
Name of District	Lahore (PULSE)
Name of Tehsil	
Name of Locality	PMU (PULSE)
Name of Facilitator	Asma Sjaz
Name of Note Taker	Haseeb Nawaz

Participant Attendance Sheet (Implementor Partner) <sup>PULSE</sup>

1	2	3	4	5	6	7	8	9
Tag	Name	Age	Designation	Education	Organization	Contact No	Email	Signature
A	M. Muzamil <i>Muzamil</i>	52	GRM Specialist	M.A. Sociology	PULSE	0300-8689401		<i>Muzamil</i>
B	Hafiz A. Ghaffar	42	Env. Safeguards Specialist	M.Sc. (Economics)	PULSE	0300-4337453		<i>Hafiz</i>
C	Mahira Waseem	44	Social Safeguards	M.Sc. Home Affairs	PULSE	0336-1000557		<i>Mahira</i>
D	Nazir Ashraf	39	GIS Specialist	M.Phil. GIS	PULSE	0333-6994555		<i>Nazir</i>
E	Tajwan Saeed	39	Gender Sp	M.Phil. Sociology	PULSE	0318-4981122		<i>Tajwan</i>

## Annex-4: Appendix F- SEA and SH Performance Declaration for Sub-consultants.

*[The following table shall be filled in for the Consultant, each member of a Joint Venture, and each Sub-consultant proposed by the Consultant]*

Consultant's Name: *[insert full name]*

Date: *[insert day, month, year]*

Joint Venture Member's or Sub-consultants Name: *[insert full name]*

RFP No. and title: *[insert RFP number and title]*

Page *[insert page number]* of *[insert total number]* pages

### **SEA and/or SH Declaration**

We:

- (a) have not been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations
- (b) are subject to disqualification by the Bank for non-compliance with SEA/ SH obligations
- (c) had been subject to disqualification by the Bank for non-compliance with SEA/ SH obligations. An arbitral award on the disqualification case has been made in our favor.

***[If (c) above is applicable, attach evidence of an arbitral award reversing the findings on the issues underlying the disqualification.]***



## Annex-5: SOPs/ Misconduct Responses Procedures

### SOPs/ misconduct response procedures

SOPs/ misconduct response procedures will be activated upon receiving or on notification of allegation of GBV/SEA/SH connected to the Project.

Standard Operating Procedures (SOPs) or Misconduct Response Procedures related to GBV/SEA/SH are critical for IPs /Contractors/Survey Firms/Consultant Firms to respond effectively and appropriately to such incidents.

Below are some key focused areas that maybe considered for misconduct response procedures regarding SEA/SH:

### GBV/SEA/SH Misconduct Response Procedures

#### 1. Reporting

- Clearly outline the procedures for reporting incidents of GBV, SEA, or SH.
- Specify multiple reporting channels, including confidential options.
- Ensure that all staff members are aware of their duty to report such incidents promptly.

#### 2. Initial Response

- Designate individuals or a response team responsible for the initial response to reported incidents.
- Ensure that immediate support services are made available to survivors, including medical, counseling, and legal assistance.

#### 3. Documentation

- Establish a standardized form or process for documenting reported incidents, ensuring accuracy and confidentiality.
- Record details such as date, time, location, involved parties, and a brief description of the incident.

#### 4. Preliminary Assessment

- Conduct a preliminary assessment to determine the severity and urgency of the reported incident.
- Identify if any interim measures are needed to ensure the safety and well-being of those involved.

#### 5. Formal Investigation

- Initiate a formal investigation promptly if the preliminary assessment indicates the need.
- Appoint an impartial investigator or investigation team to gather evidence, interview involved parties, and make findings.

#### 6. Confidentiality

- Emphasize the importance of maintaining confidentiality throughout the reporting and investigation process.
- Clearly define the limited circumstances under which confidentiality may be breached.

#### 7. Support Services

- Ensure that support services, including counseling and legal assistance, are available to survivors throughout the investigation process.
- Consider providing support to accused parties as well, acknowledging the stress of the investigation.

## **8. Decision and Action**

- Based on the findings of the investigation, make a decision regarding the alleged misconduct.
- Implement appropriate disciplinary measures, following organizational policies and legal requirements.

## **9. Communication**

- Develop a communication plan to inform relevant stakeholders about the outcome of the investigation.
- Ensure that communication is handled with sensitivity, respecting the privacy and dignity of all parties involved.

## **10. Follow-Up**

- Monitor the well-being of the survivor and provide ongoing support as needed.
- Evaluate the effectiveness of the response procedures and make improvements as necessary.

## **11. Legal Compliance**

- Reiterate the organization's commitment to complying with local and international laws and regulations related to GBV, SEA, and SH.

## **12. Training and Prevention**

- Conduct regular training on the organization's response procedures to ensure all staff members are aware of and understand the process.
- Emphasize the importance of prevention measures to create a safe working environment.

## **13. Review and Revision**

- Regularly review and update the response procedures based on feedback, changing circumstances, or legal requirements.

## **14. Reporting to Authorities**

- Clarify the organization's policy on reporting incidents to relevant authorities, as required by law.

## **15. non-retaliation**

- Emphasize that retaliation against those who report misconduct or participate in an investigation is strictly prohibited and will be addressed.

## **16. Acknowledgment**

- Require all staff members to acknowledge receipt of, understanding, and commitment to follow the organization's GBV/SEA/SH Misconduct Response Procedures.

## **17. Appeal Process**

- Establish an appeal process in case of an event where the complainant is not satisfied with the decision.
- The complainant should be informed about their right to appeal against the decision within the prescribed time frame.

# COMMUNICATION GUIDE





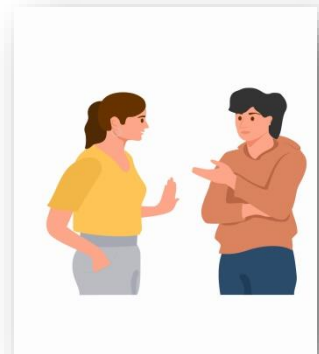
## Annex-6: Communication Guide

Communication is the process of exchanging information, ideas, thoughts, or feelings between individuals or groups using verbal or nonverbal methods. It is a fundamental aspect of human interaction and is essential for conveying meaning, establishing connections, and sharing understanding. Communication can take various forms, including spoken or written language, gestures, body language, facial expressions, and visual or auditory signals. Effective communication involves not only the transmission of a message but also the reception and interpretation of that message by the intended audience. It plays a crucial role in personal relationships, worker interactions, community interactions, and virtually every aspect of human life. The following are the guidelines for communication with gender minorities. These guidelines will apply to all project staff and contractors/IPs/Consulting firms for communication with gender minorities, especially during the survey in the project sites and parcel mapping.



**Communication Guidelines for Gender Minorities:** When communicating with gender minorities, it's essential to create an inclusive and respectful environment. Here's a guide with special guidelines for consultation:

- The project/contractor staff will avoid assumptions about gender identity. Instead of using "he" or "she," use gender-neutral terms like "they" or the person's preferred pronouns. Correct yourself if you make a mistake with pronouns. Apologize and move on without making a big deal out of it.
- Allow individuals to provide their preferred name, even if it's different from their legal name. This helps create a safe and affirming space.
- During the survey/parcel mapping include options for various gender identities in forms and documentation. Provide a blank space for individuals to specify their gender if it's not covered by the available options.
- The project will design, develop, and display inclusive symbols, posters, or materials in office space to signal a welcoming environment for gender minorities.
- The contractors/IPs/Consulting firms will also follow the abovementioned symbols, posters, or materials in office space to signal a welcoming environment for gender minorities.
- Ensure restroom facilities are inclusive and considerate of diverse gender identities.
- Stay informed about different gender identities, terminology, and issues facing gender minorities. This demonstrates your commitment to understanding and respecting their experiences.

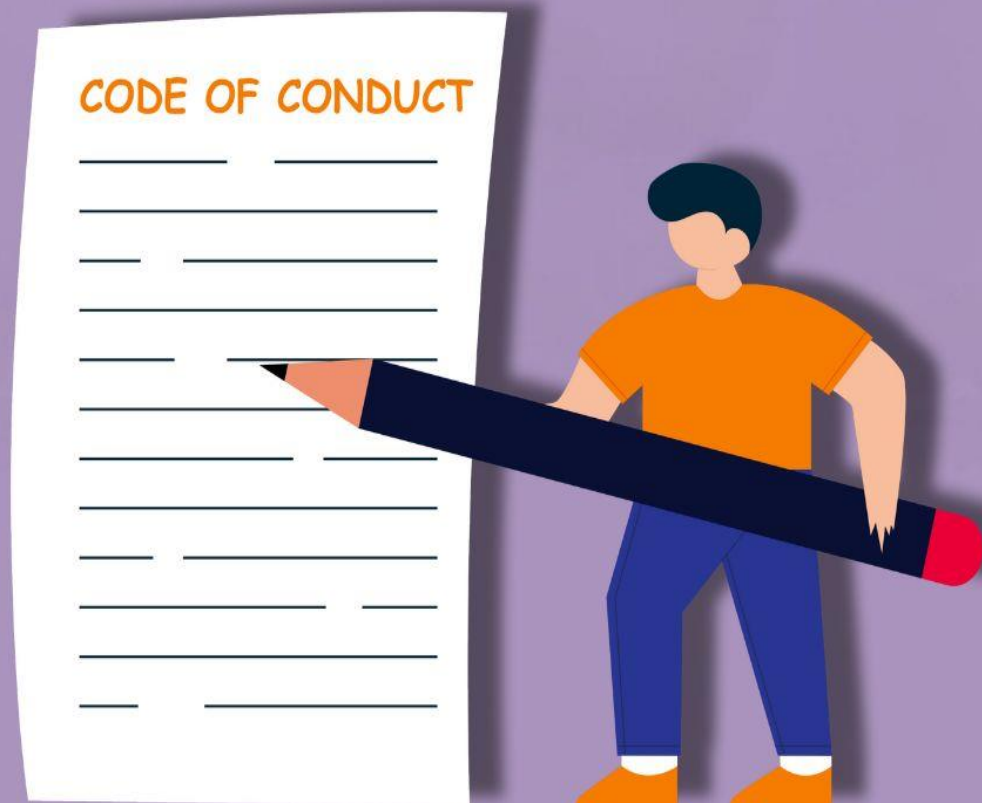


- Respect the privacy of gender minorities. Only disclose information about a person's gender identity if explicitly authorized, and always maintain confidentiality.
- Listen carefully and create an open and non-judgmental space for individuals to share their experiences. Listen actively and validate their feelings and perspectives.
- Ensure that all staff members are educated on inclusive practices and are aware of the specific needs and challenges faced by gender minorities.
- Periodically review and update project policies to ensure they reflect best practices for inclusivity and respect for gender minorities.
- communicate and display anti-discrimination policies that explicitly include gender identity.
- Act promptly to address any instances of discrimination or disrespectful behavior.



By following these guidelines, the project can create an environment that respects and supports gender minorities during consultations, fostering a positive and inclusive experience.

# CODE OF CONDUCT FOR PROJECT STAFF



## Annex-7: Code of Conduct

### Code of Conduct for Project Staff (Abstracted from Good Practice Note 2022)

This Code of Conduct identifies the behavior that we require from all projects/Contractor/IPs/Consulting Firms Personnel hired under the PULSE project. Our workplace is an 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.

#### REQUIRED CONDUCT

##### Project staff shall:

1. Carry out his/her duties competently and diligently.
2. Comply with this Code of Conduct and all applicable laws, regulations, and other requirements, including requirements to protect the health, safety, and well-being of project staff.
3. Report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation that he/she reasonably believes presents an imminent danger to his/her life or health.
4. Treat other staff with respect, and not discriminate against specific groups such as women, people with disabilities, minorities, transgender and migrant workers under the PULSE project
5. Not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel under the PULSE project.
7. Not engage in Sexual Exploitation, which means 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.
8. Complete relevant training courses under the project that will be provided related to the environmental and social aspects of the Contract, including health and safety matters, Sexual Exploitation, and Sexual Abuse (SEA).
9. Report violations of this Code of Conduct; and
10. Not retaliate against any staff member who reports violations of this Code of Conduct, whether to project management or any other channel

#### RAISING CONCERNS

If any staff observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

- a. Contact the concerned individual, or another individual designated by the project to handle these matters in writing or by email, telephone, or call a hotline.
- b. The person's identity will be kept confidential unless reporting of allegations is mandated by provincial law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. The project takes seriously all reports of possible misconduct and will

investigate and take appropriate action. The project will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any staff/ person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct under the project.

## **CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT**

Any violation of this Code of Conduct by staff may result in serious consequences, up to and including termination and possible referral to legal authorities.

### **FOR PROJECT STAFF:**

I have received a copy of this Code of Conduct written in a language that I understand. I understand that if I have any questions about this Code of Conduct, I can contact the GBV/GS project requesting an explanation.

**Name of Project staff** \_\_\_\_\_

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

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

**Countersignature of an authorized representative of the Project:**

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

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

# GBV/SEA/SH SERVICE PROVIDERS DIRECTORY



## Annex-8: Directory of GBV/SEA/SH Service Providers

This referral directory provides contact information regarding services that respond to cases of GBV/SEA/SH and other human rights violations. This includes police and law enforcement, government helplines, and Provincial commissions that provide legal aid, and psycho-social support at the Provincial level as well as at the district level. The directory aims to facilitate Women's Rights Defenders as well as women survivors of GBV/SEA/SH in securing themselves and their rights. The information for the directory was collected directly from institutions and individual actors which include women shelter staff, departments of police and health, hospitals, Legal aid committees at the district level, and social welfare department with the hope that this directory will provide multi-sectoral referral pathways ensuring the provision of services to GBV/SEA/SH survivors.

Organization	Type of services	Contact Number
<b>Provincial Helplines:</b>	<b>Ombudspersons and Commissions</b>	
Punjab Commission on the Status of Women (PCSW)	<p>The Punjab Women's toll-free Helpline is available 24/7. Managed and supervised by PCSW, the helpline team comprises of all-women call agents, three legal advisors, psychosocial counselors, supervisors, and management staff to address inquiries and complaints and provide psychosocial counseling on a range of gender-specific issues.</p> <ul style="list-style-type: none"> <li>• Workplace harassment</li> <li>• Gender discrimination</li> <li>• Property disputes and inheritance rights</li> <li>• Domestic violence</li> <li>• Increased women's participation in government decision-making bodies.</li> <li>• Quota for women in public sector jobs</li> </ul>	<p>Toll-free Hotline/Helpline: 1043</p> <p>Phone No: 042-99268446</p> <p>Email: sot@wdd.punjab.gov.pk</p> <p>Helpline: 1043</p> <p>Hours of Operation: 24/7</p>
Ombudsperson Punjab for Sexual Harassment of Women at the Workplace	<p>The Office of the Ombudsperson takes up cases of those harassed at their workplace. The complainants include class IV employees to senior officers of both public and private organizations. It was set up to facilitate women it provides informal conflict resolution, mediation services, and advocacy for fair treatment and fair process. All the services provided are confidential. Written applications can be submitted directly to the office, through post, or online. Android mobile application for registration or appeal of complaints is also available</p> <ul style="list-style-type: none"> <li>• Redressal: Investigates and addresses complaints of discrimination and injustice, including domestic violence, workplace harassment, property disputes denial of education/healthcare, forced marriages, and human trafficking.</li> <li>• Legal Aid: Provides legal representation to women facing legal challenges related to their cases.</li> </ul>	<p>Phone No: 042-99233348-50</p> <p>Email: Ombudsperson.gov.pk@gmail.com</p>

	<ul style="list-style-type: none"> <li>• Advocacy: Raises awareness about women's rights and advocates for legal &amp; policy reforms to protect women in Punjab.</li> <li>• Reporting: Submits annual reports highlighting trends &amp; recommendations for improving women's rights.</li> <li>• Accessibility: Operates regional offices and a Women's Helpline for easy access to services across Punjab.</li> <li>• Support: Provides trauma-informed counseling and collaborates for safe shelters and temporary housing for women in need</li> </ul>	
Women Development Department (WDD)	The Department was established to promote gender equality and women's empowerment through legislation, policy formulation, and sectoral planning for women's development. It is also mandated to promote and monitor the execution of national and provincial policies and commitments on gender reforms and women's development	Phone: 042-99268446 Email: sot@wdd.punjab.gov.pk Address: 37, Main Gulberg, Lahore, Punjab Hours of Operation: Monday to Friday, 9 am to 5pm
Police & Law Enforcement		
Police Department	<ul style="list-style-type: none"> <li>• 24/7 hotline service for reporting and seeking assistance in cases of abuse or harassment.</li> <li>• Legal Aid Cell: Offers legal guidance and connects women with pro bono lawyers for legal needs related to gender-based violence, property rights, etc.</li> <li>• One-Stop Crisis Centers: Integrated facilities providing medical aid, psycho-social support, legal counseling, and temporary shelter for women facing violence.</li> <li>• Reliable/Valid Tracking system of cases</li> </ul>	Contact links: <a href="https://punjabpolice.gov.pk/cpo_contactdetails">https://punjabpolice.gov.pk/cpo_contactdetails</a> Other Police Units Regional Police Offices City Police Offices District Police Offices Public Information Officers (PIOs)
Police Helpline	<ul style="list-style-type: none"> <li>• Police helpline in case of a threat, emergency or to report a crime</li> </ul>	Phone: 15 Hours of Operation: 24 /7
IG Punjab Complaint Helpline IGP	<ul style="list-style-type: none"> <li>• An initiative of the Punjab Police to complain in an expeditious manner. The following nature of complaints are entertained at the IGP Complaints</li> <li>• Center:</li> <li>• Non-Registration of FIRs</li> <li>• Faulty investigations</li> <li>• Illegal detentions</li> <li>• Arrests of innocent persons</li> <li>• Registration of false FIR</li> <li>• Slackness in Duty</li> <li>• Demand for illegal gratification</li> <li>• Complaints can be made via SMS and voice calls on a short code (8787).</li> <li>• Moreover, complaints are also received.</li> </ul>	<ul style="list-style-type: none"> <li>• Complaint Helpline: 8787</li> <li>• Phone: 042-99212609</li> <li>• Hours of Operation: 24/7</li> </ul>



	<ul style="list-style-type: none"> <li>• online as well as through emails.</li> </ul>	
Women Police Station	The Station is staffed with women police officers who are tasked with providing prompt help to female victims of crime and domestic violence.	Phone: 0429-9200300   0429-9200278 Hours of Operation: 24/7
Social Welfare Department (SWD)	<p>The SWD (in all districts of Punjab) works towards providing an equitable and well-functioning social protection system anchored at the principles of empowerment and inclusion for all, particularly the marginalized. The following services are provided by SWD.</p> <ul style="list-style-type: none"> <li>• Women Shelter Homes (Dar-ul-Aman)</li> <li>• Shaheed Benazir Bhutto Human Rights Centers for Women (Crisis Centers)</li> <li>• Women Protection Centers: Provide safe havens, counseling, and legal aid to women facing violence and abuse.</li> <li>• One-Stop Crisis Referral Centers: Offer integrated services for victims of gender-based violence, including medical assistance, psycho-social support, and legal guidance.</li> <li>• Public Awareness Campaigns: Raise awareness about women's rights, gender equality, and prevention of violence against women.</li> <li>• Community Outreach Programs: Collaborate with NGOs and local communities to reach vulnerable women and provide access to social services.</li> </ul>	Phone: 042- 992 04149, 042-99204768
Violence against women Centre/protection Centre under Punjab Women Protection Authority	<ul style="list-style-type: none"> <li>• Complaint and Registration of Case.</li> <li>• Referring cybercrime cases to FIA.</li> <li>• Forensic evaluation (Mini evidence facility at each VAW center).</li> <li>• Software/Database system for storing monitoring complaints.</li> <li>• Mediation Services before launching an FIR.</li> <li>• Provide Information regarding any sort of free services e.g. psychological, financial, or legal.</li> <li>• One Transgender officer called the Victim Support Office (VSO) for victims (especially transgender).</li> </ul>	<p>Phone: 042-99333817</p> <p>Email: pwpa.official@pwpa.punjab.gov.pk</p>
District Legal Empowerment Committee (FREE LEGAL AID COMMITTEES)	Free legal aid (Fee of lawyer, court fee, copying charges, process fee, etc. to poor and vulnerable persons who are unable to pursue their cases in the court of law for want of financial hardship.	At the district level under District Administration
Bilquis Edhi Home	The shelter home takes in abandoned children, mentally and physically disabled persons as well as women victims of violence	Phone: 042-35156363 Address: Street 2, Township Block 1, Sector C-2 Lahore Hours of Operation: 24/7
Bait-ul-maal Punjab	Bait-ul-Maal funds for the medical treatment of deserving patients are provided to provincial-level	Phone: 042-99204157, 042-99204158

	teaching hospitals, DHQ hospitals, and THQ hospitals of the Government of the Punjab.	Email: <a href="mailto:punjabbaitulmaal@yahoo.com">punjabbaitulmaal@yahoo.com</a>
DHQs, THQs, BUHs and RHCs	All DHQs, THQs BHUs provide medical care in the project areas. RHCs provide primary health care services and a gynae consultant available at the RHC and also are responsible for medicolegal in cases that require it	At DHGs, THQs, BHUs, and RHCs are available in project districts/ areas.
Center for Legal Aid Assistance and Settlement (CLAAS)	CLAAS has built a credible reputation in Pakistan for its specialized legal and rehabilitative services. Organizations, churches, NGOs and other institutions refer different cases to CLAAS from all over Punjab.	Phone : +92 (42) 35457317 Email: <a href="mailto:joseph.claaspk@gmail.com">joseph.claaspk@gmail.com</a> Address : 160 – Hamza Town Opposite Youhanabad Ferozepur Road, Lahore.
Digital Rights Foundation (DRF)	Digital Rights Foundation aims to strengthen protections for human rights defenders (HRDs), with a focus on women's rights, in digital spaces through policy advocacy & digital security awareness-raising. In addition, the Foundation also protects women from work and cyber harassment. DRF prioritizes women and transgender persons.	Cyber Harassment Helpline: 0800-39393 9:00 am to 5:00 pm

### Annex-9: List of NGOs/CBOs

District	NGOs Participated
Lodhran	Istiqam-e-Pakistan
	Al Raheem development organization
	Khushboo Welfare and Development Org
	Christian farmer development Org
Nankana Sahib	Shehri ijtimai Taraqiati Council
	Pehchan Welfare Society
	Baba Farid Welfare Org
Multan	Society for Special Person
	Savial development Org
	Former development Org
Khanewal	Roshan Rahen Org
	Youth development Org
	Tasneeha Foundation
	FRD Rural Development Org
Hafizabad	Dehi Welfare Org
	Allah wasai women welfare Society
	Sehr Welfare Society
	Women Welfare Society
	Christian Welfare Society
	Sangat Foundation

## Annex-10: Consent to Disclosure of Information

### CONFIDENTIAL

### Consent to Disclosure of information

Instructions :

1. This form should be read to the complainant or his/her guardian in his/her mother tongue.
2. It should be clearly explained to the complainant that he/she can choose any or all of the proposed options (for example, only having access to care services without consenting to the complaint management mechanism process).
3. Please explain in detail to the plaintiff what the GM process will look like, inform the complainants who will contact them, for what purpose, and what the time frames are. Please adapt the information to the context of your project in as much detail as possible. Here is an example of what you could say: "The GM is an administrative procedure and can only give rise to administrative sanctions, if any, only in accordance with labour law and contractor policies. The GM will not give rise to any compensation or reparation, but you retain the right to seek legal advice and you can start the judicial process at any time. The GM process means that a person designated by the project (please provide details of their identity) will contact you, the alleged perpetrator, and others who may know the case to verify the information contained in the complaint."
4. Ensure that the complainant is fully aware that he or she may change his or her mind at any time and that, as a result, the process would stop.
5. Do not attach this consent form directly to the complaint registration form; it should be kept separate to ensure the confidentiality of the information provided by the beneficiary. Keep all forms secure and prevent unauthorized access.

I, \_\_\_\_\_,  
understand that I am free to consent to all or only one of the options below (for example, only to have access to management services without consenting to the GM process). I am also aware that I may refuse to consent to any option. I understand that the GM is an administrative procedure and can only give rise to administrative sanctions, if any, in accordance with labour law and contractor policies. I understand that the GM will not give rise to any compensation or reparation, but that I retain the right to seek legal advice at any time.

1- I authorize \_\_\_\_\_ (name of the project implementation unit) to share information regarding my complaint with the alleged perpetrator's employer so that they can initiate the complaint management mechanism process. I understand that the process will involve an audit and that I will be contacted to provide details of the complaint. I have received detailed information about the GM process, who will contact me, with what purpose and timeframe and I agree to participate in these steps. I retain the right to change my mind at any time regarding the disclosure of information to the body/contact person named below and that in this case the process of handling my complaint will be interrupted. I understand that the

information provided will be treated with confidentiality and respect, and will only be disclosed if necessary in the administrative process of verifying my complaint.

1- Authorization to be underlined by the complainant: Yes      No

(or the parent/guardian if the complainant is under 18 years of age)

2- I authorize \_\_\_\_\_ (name of the project implementation unit) to provide the service provider(s) I have designated with information specifically related to my case, in order to be able to receive assistance according to my security, health, psychosocial, and/or legal needs. I understand that the information provided will be treated with confidentiality and respect, and will only be disclosed if necessary to enable me to receive the assistance I have requested. I retain the right to change my mind at any time regarding the disclosure of information to the contact person/body named below.

I have been informed and understand that some non-identifying information may also be provided for reporting purposes. Any information disclosed will not be specifically related to me or the incident. It will be impossible to identify myself based on the information provided. I understand that the information provided will be treated confidentially and with respect.

I would like my information to be communicated to:

(tick the appropriate boxes and specify the name, department, and agency/organization, if applicable)

- Security services (specify): \_\_\_\_\_
- Psychosocial services (specify): \_\_\_\_\_
- Health / medical services (specify): \_\_\_\_\_
- Safe place/refuge (specify): \_\_\_\_\_
- Legal assistance services (specify): \_\_\_\_\_
- Protective services (specify): \_\_\_\_\_
- Livelihood services (specify): \_\_\_\_\_
- Other (specify the type of service, name, and organization): \_\_\_\_\_

2- Authorization to be underlined by the complainant: Yes      No

(or the parent/guardian if the complainant is under 18 years of age)

I understand that the lack of my consent to the start of the complaint management mechanism (if I underlined "no" in point 1) means that my complaint will be closed and none of the confidential and/or identifiable information will be shared (the grievance entry point will only use the type of violence reported and the gender of the complainant for reporting purposes).

I also understand that the refusal to proceed with the registration of my complaint within the project will not affect my rights to access support services.

**Signature/thumbprint of the complainant:  
(or the parent/guardian if the complainant is under 18 years of age**

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**Entry point code/signature:**

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**Date:** \_\_\_\_\_

**Agreed contacts with the complainant for all successive interactions :**

**Telephone:**

**Address:**

**Other:**

Do not attach this consent form directly to the complaint registration form; it should be kept separate to ensure the confidentiality of the information provided by the beneficiary.

Keep all forms secure and prevent unauthorized access.

## Annex-11: Terms of Reference of the Assignment

To Conduct a Risk Assessment for Gender Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), Preparation of a Mitigation Action Plan, and Provision Of GBV/SEA/SH Prevention/Awareness Trainings.

### 1 BACKGROUND

The Government of Punjab (GoPunjab) is implementing a project titled the Punjab Urban Land Systems Enhancement Project (PULSE) with a credit in the amount of US\$150 million from the International Development Association (IDA/World Bank). The Project Development Objective (PDO) of PULSE is to support the GoPunjab with (i) improved land records; and (ii) identification of land for development, including land for housing programs. PULSE aims to achieve: (i) the provision of digital land records linked to cadastral maps and DRM data; (ii) improved tenure security and access to land for housing; (iii) a unified modern land information system; and (iv) a strengthened capacity and regulatory framework. In this context, the public in Punjab, particularly women and vulnerable groups, will benefit significantly from increased security of land rights and property ownership. The Project comprises the following parts:

**Component 1:** Digital Land Records and Cadastral Maps for the Land Records Management and Information System or LRMIS to develop a seamless and multipurpose cadastral map linked to the digital land records for Punjab Province.

**Component 2:** Land for Housing to support the GoPunjab in the identification, evaluation, and mobilization of low disaster risk public/state lands, including resilient housing.

**Component 3:** Integrated Land and Geospatial Information Systems and Services to establish a modern Land Information System, unifying and integrating rural and urban land records; and

**Component 4:** Project Management and Institutional Strengthening to support the GoPunjab to manage, implement, and supervise project activities, and training and skill development.

For the implementation of PULSE and according to the agreed terms under the financing, a Project Management Unit (PMU) was established in the Board of Revenue (BoR), together with the Project Implementation Units (PIU) in the Punjab Land Records Authority (PIU-PLRA), to coordinate, manage, implement, and supervise PULSE.

Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) is a global issue that affects 1 in 3 women in their lifetime. Incidents of SEA and SH have occurred in projects financed by the World Bank. As a result, the Bank is taking concerted measures to strengthen its approach related to the management and prevention of SEA/SH risks. Moreover, there is a substantial risk of Gender Based Violence (GBV)/SEA/SH within families and communities, when women claim their inheritance rights. PULSE includes interventions on strengthening response to GBV/SEA/SH issues to mitigate project-specific risks.

GBV in Pakistan is multi-faceted, interrelated, and recurring; it includes physical, sexual, psychological, emotional, and economic abuse and exploitation, occurring in both private and public spaces and is grounded in elements of situational and socio-cultural factors. Major categories of violence against women are murder, abduction/kidnapping, rape/gang rape, 'honor' killing, domestic disputes, dowry disputes, acid attacks, inheritance disputes, child and forced marriage. 28% of women (15-49 years) have experienced physical violence since age 15 in Pakistan. 34% of ever-married women have experienced spousal physical, sexual, or emotional violence<sup>1</sup>. In Punjab, 1 in 3 women between 15 and 64 years has faced some form of violence<sup>2</sup>. 76.7 % of women (15-49 years) in Punjab have

experienced assault within their homes<sup>3</sup>. 56% of Pakistani women never sought help or disclosed GBV due to socio-cultural and other problems regarding accessibility to health care and psycho-social support services.

## **2. OBJECTIVE OF ASSIGNMENT**

The objective of the consultancy is to assess, manage, and prevent the risks of GBV/SEA/SH potentially arising from project activities. The Risk Assessment and Mitigation Action Plan developed under this consultancy shall be consistent with the World Bank Environment and Social Framework standard 4, and guidance documents (noted below). This activity shall take place before the start of the Pilot Phase scheduled in 2023 and will need to include an Accountability and Response Framework, as well as an assessment of the capabilities of the available GBV service providers in and around the project location to provide quality survivor-centered services, including case management and referral services.

The Consultant firm (or NGO) shall work closely with the Project Director and Gender Specialist at PMU- BoR, and relevant staff at the PIU-PLRA.

## **3. SCOPE OF SERVICES**

The consultant firm (or NGO) is expected to perform the following specified tasks related to a GBV/ SEA/SH Risk Assessment and developing a GBV/SEA/SH Risk Mitigation Action Plan:

### **1) Risk Assessment for GBV/SEA/SH**

- Conduct a needs assessment to ascertain the level of awareness of PMU-BoR, PIU-PLRA, and Directorate of Katchi Abadis (DGKA) on SEA/SH risks, through Focus Group Discussions (FGDs), Questionnaires, and other means deemed appropriate by the Consultant.
- Conduct a literature review to understand harmful and discriminatory social norms, practices, attitudes, and behaviors around GBV and prevalence rates.
- Conduct a review of existing monitoring protocols and document existing measures available/adopted by PMU/PIU and DGKA to ensure compliance with the World Bank Good Practice Note on Addressing Gender-Based Violence in Investment Project Financing involving Major Civil Works (2nd Edition, 2020) and Procurement Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) Prevention and Response Measures.
- Identification of relevant organizations and community actors to provide information and support for GBV-related initiatives.

### **2) Preparation of GBV/SEA/SH Risk Mitigation Action Plan**

- Based on the outcome of the needs assessment and existing protocols, propose additional measures needed to prevent GBV/SEA/SH in project activities involving land titling and regularization, which would include community awareness-building initiatives, and development of Codes of Conduct/behavior standards.
- Propose an effective GBV/SEA/SH Grievance Redress Mechanism (GRM) model (as part of the main GRM) for the project with multiple access options, trained staff, and a specific protocol handling GBV/SEA/SH complaint so the right action is triggered.

### **3) Provision of GBV/SEA/SH Prevention/Awareness Training and development of required protocols**

- Prepare a Training/Awareness Sessions Calendar
- Train implementing partners on GBV/SEA/SH



- Support PMU/PIU in developing misconduct response procedures and Standard Operating Procedures (SoPs) upon receiving or being notified of an allegation of GBV/ SEA/SH connected to PULSE. These procedures and protocols should enable the provision of services for survivors that are timely, confidential, and survivor-centered and protect survivors from stigma and retaliation and linked to the GBV/SEA/SH GRM.
- Conduct awareness and sensitization for communities where land titling will take place (as part of the stakeholder engagement activities) to hear from them on potential project risks and inform them about SEA/SH prevention and reporting options.
- Prepare notes of all consultations and key informant interviews along with transcripts

#### 4. DELIVERABLES

Once the consultant firm is engaged and deployed, the firm shall provide:

**A. Inception Report** detailing methodology, work plan, relevant questionnaires to be deployed, outline of Risk Assessment & Mitigation Action Plan duly approved by PMU-BoR within 2 weeks of contract signing.

**B. Risk Assessment, within 4 weeks of Inception Report finalization, containing.**

- An executive summary, highlighting the main results of the analysis and recommendations.
- Findings and analysis of SEA/SH risks arising as a result of project activities, based on results/analysis of data received from consultations and key informant interviews.
- Findings and analysis of the training needs assessment of PMU-BOR and implementing institutions, leading to a training calendar with contacts of potential trainers.
- Propose recommended components for the SEA/SH risk mitigation plan.

**C. GBV/SEA/SH risk Mitigation Action Plan**, within 4 weeks of finalization of Risk Assessment, responding to risk analysis which shall include the following:

- SEA/SH Communications Guide, with specific Guidelines for Consultations with Gender Minorities.
- Code of Conduct for Project staff on dealing with SEA/SH grievances.
- SoPs/Misconduct Response Procedures to activate upon receiving or being notified of an allegation of SEA/SH connected to the Project.
- Procedures and protocols to enable the provision of services for survivors that are timely, confidential, and survivor-centered and protect survivors from stigma and retaliation.
- Accountability and Response Framework.
- GBV service providers directory.
- Training and Awareness Sessions Calendar and Resource Persons List.

**The Training and Awareness Sessions** (as per the approved training calendar), Based on the findings of the Risk Assessment and Mitigation Plan, a Training and Awareness Sessions Calendar will be proposed by the Consultant and approved by the PMU-BoR. It is expected that at least 12 training/awareness sessions will be held for different stakeholders as a part of this Contract, over 6 months following the finalization of the Risk Assessment and Mitigation Action Plan. Additional training/sessions can be added upon the mutual consent of the Consultant and PMU-BOR.

- Training of implementing partners, surveyors, and all beneficiary-facing personnel of implementing partners on GBV/SEA/SH misconduct response procedures and Standard Operating Procedures (SoPs) to be followed upon receiving or being notified of an allegation of SEA/SH connected to PULSE.
- Conduct awareness and sensitization for communities where land titling will take place (as part of the stakeholder engagement activities) to hear from them on potential project risks and inform them about SEA/SH prevention and reporting options.

## 5. TIMING AND LEVEL OF EFFORT

The Consultant Firm (or NGO) will be engaged on a Lump-Sum basis. The engagement is initially expected for six (06) months as per the GoPunjab's notified schedule, and is extendable based on needs and results of performance evaluation. The assignment is expected to start in August 2023.

## 6. QUALIFICATIONS

The Consultant shall have the following minimum qualifications and experience:

- i. The Consultant must have at least 8 years of experience in the social sector.
- ii. Have relevant experience in preparing Risk Assessments for Gender- Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH), Preparation of a Mitigation Action Plan, and GBV/SEA/SH Prevention, Awareness, and Trainings.

Human Resource

At least three (03) professional experts working in the firm with the following qualification:

### • Qualification and Skills

- Master's degree or higher educational degree in Social Sciences (Anthropology / Sociology / Political Economy / Social Development / Gender Studies) or equivalent from HEC recognized university / institute
- At least 8 years of experience working in the field of social protection, with expertise in SEA/SH and/or GBV prevention, risk mitigation and response programming, and training.
- Experience in monitoring, evaluation, or research, and practical knowledge of quantitative and qualitative research and/or monitoring methodologies.
- Knowledge and experience in Development projects or public sector organizations (e.g., government-funded projects or World Bank/international agencies/other multilateral agencies funded projects) considered as an advantage.

## 7. PAYMENT METHODS

Payments will be made as follows:

- i. First payment of 10% against the submission of the Inception Report, including the Work Plan and detailed Methodology.
- ii. Second Payment of 30% with the delivery of Risk Assessment findings, analysis, and recommendations.
- iii. Third Payment of 30% with the delivery of GBV/SEA/SH Risk Mitigation / Action Plan.
- iv. Final Payment of 30% with completion of all deliverables including conduct of training and awareness sessions.

## 8. REPORTING ARRANGEMENTS

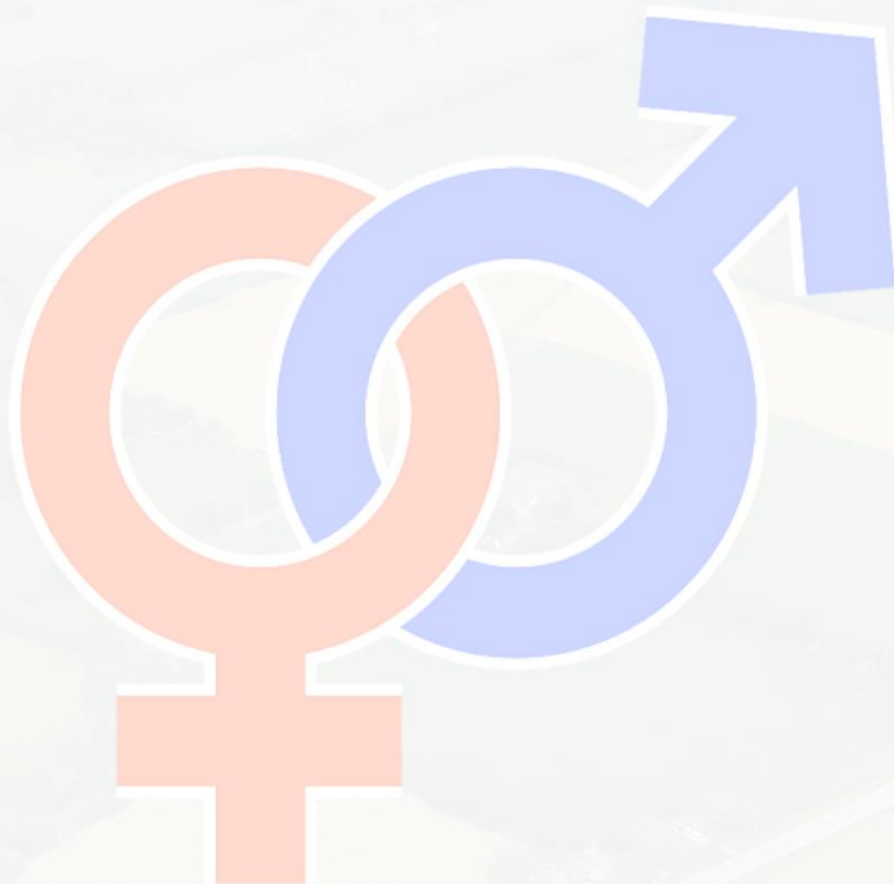
The Consultant will report to the PD of PMU-BoR who will be assisted by the PMU Gender Specialist.

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**A commitment to Social Change**



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