



Republic of Kenya

**Second Kenya Social and Economic Inclusion Project
(P504218)**

Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) Prevention and Response Action Plan

Revised April 2025

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Abbreviations

ASAL	Arid and Semi-Arid Lands
BWC	Beneficiary Welfare Committee
CBO	Community Based Organization
CCTP - MIS	Consolidated Cash Transfer Program–Management Information System
CDSO	County Disability Service Officer
CEDAW	Convention on the Elimination of all forms of Discrimination Against Women
CoC	Code of Conduct
CoG	Council of Governors
CoK	Constitution of Kenya
CDFSC	County Drought Food and Security Committee
CMS	Case Management System
CPV	Child Protection Volunteer
CRC	Convention on the Rights of a Child
CSO	Civil Society Organization
DSD	Directorate of Social Development
DSA	Directorate of Social Assistance
CT-OVC	Cash Transfer for Orphans and Vulnerable Children
DRFRS	Disaster Risk Financing Strategy
DRM	Disaster Response Management
DSA	Directorate of Social Assistance (DSA)
CT-OVC	Cash Transfer - Orphans and Vulnerable Children
CT – OP	Cash Transfer – Older Persons
CTWC	Cash Transfer Working Committee
eGCM	Enhanced Grievance and Case Management
E&S	Environmental and Social
EIP	Economic Inclusion Program
ESF	Environmental and Social Framework
ESR	Enhanced Single Registry
FGD	Focus Group Discussion
FP	Focal Point
GBV	Gender Based Violence
GM	Grievance Mechanism
G&CM	Grievance and Case Management
GoK	Government of Kenya
HSNP	Hunger Safety Net Programme
HUTLCs	Historically Underserved Traditional Local Communities
IAs	Implementing Agencies
ICCPR	International Covenant on Civil and Political Rights
IGA	Income Generating Activity
ILO	International Labor Organization
IP	Indigenous Persons
IPCRM	Integrated Public Complaints Referral Mechanism
JP-GBV	Joint Programme on Prevention and Response to GBV
KFRP	Kenya Family Resilience Program
KSEIP	Second Kenya Social Economic Inclusion Project
KWFT	Kenya Women Finance Trust
LCV	Lay Counselling Volunteer
LMP	Labour Management Procedures
M&E	Monitoring and Evaluation

MEACARD	Ministry of East African Community, ASALs & Regional Development
MIS (s)	Management Information System (s)
MLSP	Ministry of Labor and Social Protection
MOH	Ministry of Health
NCIC	National Coordination and Implementation Committee
NCPWD	National Council People with Disability
NDMA	National drought Management Authority
NEMA	National Environment Management Authority
NGAO	National Government Administration Officer
NGEC	National Gender Equality Commission
NGOs	Non-Governmental Organizations
NHIF	National Health Insurance Fund
NICHE	Nutritional Improvements through Cash and Health Education
NSNP	National Safety Net Program
NSPS	National Social Protection Secretariat
NSSF	National Social Security Fund
NT	National Treasury
ODR	Operational Delivery Risk
OPCT	Older Persons Cash Transfer
PDO	Project Development Objective
PEP	Post Exposure Prophylaxis
PLW	Pregnant and Lactating Women
PMU	Project Management Unit
PO	Programme Officer
PS	Principal Secretary
PWD	Persons with Disability
PwsD-CT	Persons with Severe Disabilities Cash Transfer
PSP	Payment Service Provider
SAGA	Semi -Autonomous Government Agency
SCO	Sub-County Officers
SDO	Social Development Officer
SDSP	State Department of Social Protection and Senior Citizens Affairs
SEA	Sexual Exploitation and Abuse
SEA/SH	Sexual Exploitation Abuse and Harassment
SEP	Stakeholder Engagement Plan
SIDA	Swedish International development Cooperation
SLVC	Sub-Location Validation Committee
SMS	Short Messaging System
SP	Social Protection
SPS	Social Protection Secretariat
UDHR	Universal Declaration of Human Rights
USAID	United States Agency for International Development
VMG	Vulnerable and Marginalized Group
VMS	Voice Messaging Systems
WB	World Bank
WFP	World Food Program

Executive Summary

This Sexual Exploitation, Abuse and Harassment (SEA/SH) Prevention and Response Action Plan has been prepared for the Kenya Social and Economic Inclusion Project (KSEIP), which is a World Bank financed project implemented by the State Department for Social Protection and Senior Citizen Affairs (SDSP) and the National Drought Management Authority (NDMA). The KSEIP 2, to be implemented in selected counties, aims to provide social and economic inclusion services to poor and vulnerable households and strengthen adaptive social protection in Kenya. The project has 4 components; (i) Building human capital of children and adolescents, (ii) Climate Resilient Economic Inclusion, (iii) Systems Strengthening and Adaptive Social Protection, and (iv) Program Management, Monitoring and Evaluation and Policy and Legislation.

Some of KSEIP 2 components such as livelihood diversification and cash transfer may cause or exacerbate SEA/SH risks and other forms of GBV to community members and project workers. The risk is heightened by the developing capacity of SDSP and the implementing partners to manage the identified/emerging social risks and impacts such as the SEA/SH. The project's SEA/SH risk is rated **Substantial (Annex 1)**. Thus, project interventions must include provisions that support women's safety as well as components aimed at changing social norms and behaviors to reduce GBV related risks. Low literacy levels, poor access to water and fuel wood in ASAL Counties exposing women and girls to the SEA/SH risk, displacement due to droughts and floods, cultural practices and high poverty levels can exacerbate the vulnerability of women and girls to SEA/SH.

The World Bank 2022 SEA-SH Good Practice Note, defines Gender Based Violence (GBV) 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. It includes sexual exploitation, abuse and harassment.

Some of the KSEIP 2 Components, such as economic empowerment and cash transfer, can alter relations including power structures in communities that place women, girls, and boys in situations where they may be exposed to SEA/SH social impacts. At the community level, implementation of KSEIP 2 can trigger potential negative social impacts and risks including:

- Intimate partner violence or violence from other family members in order to gain control of cash transfers or other project benefits;
- Intra- and inter- household and community tension or conflict due to inclusion or exclusion from accessing project benefits and opportunities;
- GBV/SEA-; in exchange for selection into the project or project benefits;
- Peer-to peer teenage/adolescent sexual abuse, exploitation and harassment;
- Sexual abuse and child defilement by guardians/caregivers, particularly, of PWDs;
- Abuse (e.g. neglect of sexual needs, forced sexual acts and blackmailing into sexual activities) of older persons receiving project benefits;
- Abuses at cash-transfer interface where vulnerable beneficiaries (women) get exploited by project workers;
- Sexual exploitation of community members by Service Providers who seek sexual favors in exchange for registration to benefit from cash transfer for livelihood support.

The situation is worsened by excluding women, and girls from priority-setting and community decision-making processes related GBV risks: Omission from spaces of voice, agency and decision-making can lead to decisions that further harm or marginalize women and girls. Prioritization that does not consider the unique and diverse needs of women and girls, , might increase their risk to GBV.

The project design such as the location for cash payment points may expose beneficiaries to use unsafe transport e.g. motor bikes (boda boda) exposing women and girls to SEA/SH risks. Physical contact with payment provider can expose beneficiaries to SEA/SH risk. Seasonal celebrations such as Christmas and burial ceremonies (*disco matanga*) fuel peer-to-peer teenage SEA/SH amongst school girls and boys.

Project workers face potential project SEA/SH risks including:

- Abuse and exploitation of vulnerable women in the workplace e.g. Community Health Promoters;
- Sexual exploitation, abuse and harassment in the context of project resources and opportunities such as field trips and workshops;

○ .

The factors that can trigger these types of SEA/SH risks among project workers include:

- *Working conditions:* f female project actors working with male project actors e.g. during registration or targeting of beneficiaries in remote and far-flung areas where there is poor accommodation. There is also the issue of extended office working hours that stretch into the night that put female workers at risk.
- *Power imbalance:* between project workers that plays during staff evaluation for promotion or confirmation to given terms of conditions of service
- *Nature of activities:* Regular/prolonged interaction with project actors including during training, workshops, and traveling including over-indulgence in alcohol
- *Code of Conduct:* Lack of SEA/SH code of conduct for project workers at all levels leading casual handling of reported SEA/SH cases by senior management at the workplace.

This SEA/SH Prevention and Response Action Plan details the necessary procedures and protocols that will be put in place to address SEA/SH issues related to the project. These include how to address any SEA/SH allegations that may arise and procedures for preventing and responding to SEA/SH. The plan has several annexes: **Annex 1:** List of stakeholders engaged; **Annex 2:** International Frameworks Applicable to GBV; **Annex 3:** Institutional Framework for Managing SEA/SH; **Annex 4:** Potential SEA/SH Risks to Community; **Annex 5:** Potential SEA/SH Risks to Project Workers; **Annex 6:** SEA/SH Code of Conduct; **Annex 7:** Treatment and Counselling Procedures; **Annex 8:** Sample Mapping of SEA/SH Support Services; **Annex 9:** Details on Leadership and Coordination and implementation arrangements and **Annex 10:** KSEIP 1 NSNP and HSNP Grievance Mechanisms

Key policies and legislations that address GBV matters in Kenya include the constitution that gives a right to person to be treated with dignity, the National Policy for the Prevention and Response to Gender Based Violence (2014), County Government Policy on Sexual and Gender Based Violence 2017), and the Legislative Framework on Sexual and Gender Based Violence for County Governments (2017). The key legislations are the Sexual Offences Act (2006), the Employment Act, (2007), Children’s Act (2022) Older Persons Bill (2024) and The Persons with Disabilities Act, 2003 (revised 2019) among others. Applicable international instruments against GBV include the Convention on the Elimination of All Forms of Discriminations Against Women (CEDAW), and the Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol).

Prevention and response to SEA/SH risks related to the project will require determined efforts involving the implementing agencies, the community, Ministries health, SEA/SH service providers, care givers such as civil society organizations (CSOs), national government offices responsible for children (e.g. children offices), national government administration officers (NGAO), Court User Committees, and the police. The current NSNP and NDMA Grievance Mechanisms are not SEA/SH-responsive and will need to be reviewed. The project will coordinate with these actors in creating awareness in the communities and project workers to lessen need for response efforts. This Plan identifies some of the interventions including community awareness and education, capacity building for project workers in SEA/SH , nomination of GBV Focal Points and engaging an Environmental and Social Specialist with a strong background in SEA/SH management, adequately resourcing the SEA/SH function in the project and enlisting the supplementary support of other SEA/SH Prevention and Response actors such as health providers, CSOs, Community based Organizations (CBOs), and Non-Governmental Organizations (NGOs). Estimated budget for implementation of this Plan is KES 4,000,000 as sensitization, induction and training activities are consolidated and budgeted for under the Stakeholder Engagement Plan (SEP).

1 Introduction

1.1 Overview of KSEIP2

The proposed Second Kenya Social Economic Inclusion Project (KSEIP 2) is a 5-year World Bank (WB) supported project with the objective of providing social and economic inclusion services to poor and vulnerable households and strengthen adaptive social protection in Kenya. It builds on KSEIP 1, by scaling effective programs, integrating innovative approaches, and enhancing institutional capacities to provide vital support to most vulnerable populations. The project is nation-wide and is structured into four (4) components presented in Table 1. These components will be implemented in selected counties:

Table 1: KSEIP 2 Structure

Component	Sub-Components	Area of Focus
Component 1: Building human capital of children and adolescents	1a: Nutrition-sensitive cash-plus program for children under three and pregnant or lactating women (PLW)	<ul style="list-style-type: none"> ○ Expanding the coverage of NICHE to twenty-five counties to provide monthly cash top-up of 1,000 KES and nutrition counseling to support the growth and development of young children. Nutrition counseling is delivered by Community Health Promoters (CHPs) of the Ministry of Health (MoH) and includes mother-to-mother support groups and community-wide counseling on optimal health and nutrition practices for both PLW and young children. ○ Testing NICHE-plus, which includes a positive parenting package and anticipatory shock responsive support, in five counties.
	1b: Cash-plus program to support adolescent education and prevent teen pregnancy	<ul style="list-style-type: none"> ○ Testing a cash-plus program that supports poor and vulnerable adolescents to remain in or re-enter school and prevent teen pregnancy. Providing a comprehensive package of support to adolescents and their families depending on the presence/severity of risk factors among adolescents and their willingness to remain in or re-enter education. Cash top-ups will be provided to support enrolment and attendance in basic primary or secondary school among adolescent boys and girls in poor and vulnerable households. ○ Supplemental services to some or all beneficiaries include: (i) skills training for adolescents who do not wish to return to school (in lieu of cash support); (ii) social and behavioral change activities for all parents and communities; (iii) case management, psychosocial support, and childcare support for teenage mothers seeking to re-enter school; (iv) life skills training, mentorship, and peer support for all adolescents; and (v) linkages to relevant social services.
Component 2: Climate Resilient Economic Inclusion	2a: Economic Inclusion Program (EIP)	<ul style="list-style-type: none"> ○ Improve economic lives of adults in poor households by supporting livelihood diversification and investments in more productive household enterprises. ○ Strengthen households' climate resilience by promoting climate-resilient livelihoods and encouraging diversification from those vulnerable to climate change. ○ Address systemic barriers preventing women from fully participating in the economy.

	2b: Linkages and co-investments in green livelihoods in selected communities	<ul style="list-style-type: none"> ○ Finance a climate-focused EIP-PLUS intervention that will be piloted in a subset of 8 NEDI counties with high climate vulnerability and poverty, limited transportation and access to markets.
	2c: Linking EIP beneficiaries to social insurance schemes	<p>Provide social insurance in the form of savings opportunities and incentives to EIP beneficiaries. Key design features by experiences of the Kenya National Youth Opportunities Towards Advancement Project (P179414) and will include:</p> <ul style="list-style-type: none"> ○ <i>Auto-enrollment</i>: All EIP beneficiaries will be registered in the social insurance scheme with a flat benefit under this sub-component. Intensive behavior change communication will be carried out by mentors engaged under Component 2a. ○ <i>Matching contributions to inculcate a savings habit</i>: During the first six months, beneficiaries will receive a 100 percent matching, subject to a cap of US\$2 per month per beneficiary, if they contribute to the scheme. This nudge is intended to reinforce the behavior change communication and promote a long-term saving habit.
Component 3: Systems Strengthening and Adaptive Social Protection	3a: Enhanced Single Registry (ESR)	<ul style="list-style-type: none"> ○ Improve the coverage, accuracy, and effectiveness of the ESR to bolster its legitimacy and capacity as a targeting platform for pro-poor programs. ○ Make key investments in the MIS and human resource capacity of the ESR.
	3b: Consolidated Cash Transfer Program (CCTP) Enhancements	<ul style="list-style-type: none"> ○ Support critical reforms and enhancements to CCTP to improve its efficiency and poverty impact. ○ Updating payment systems to maximize beneficiary choice, automation, and financial inclusion, ○ Upgrading program MISs to enhance interoperability, functionality, and flexibility, and ○ Developing and strengthening CCTP M&E functions and capacities, with a focus on devolving responsibilities to county-level staff. ○ Support innovations to improve two-way citizen engagement.
	3c: Enhancing Shock-Responsive Social Protection	<ul style="list-style-type: none"> ○ Support an expansion of HSNP and enhancements to its shock-responsive capacity by introducing anticipatory actions and enabling a risk-based, multi-hazard and multi-layered response mechanism under a renewed Disaster Risk Financing Strategy (DRFS). ○ Expansion of HSNP to almost all ASAL counties will be supported by investments in its delivery systems. The project will finance third-party, census-style data collection in new sub-counties using the ESR registration tool to identify and enroll new beneficiaries. ○ Additional investment areas include: i) implementation of ODR in all HSNP counties to allow dynamic data updates, ii) upgrades to the MIS data center for improved

		functionalities, iii) establishment of a modern call center to enhance two-way citizen engagement, iv) the remodeling of payment systems to enable beneficiary choice of payment service providers and withdrawals tools, and v) linking with existing or new early warning triggers/systems for droughts and floods.
Component 4: Project Management, Monitoring and Evaluation, and Policy and Legislation		<ul style="list-style-type: none"> ○ Will finance project management, including capacity building, M&E, and environmental and social (E&S) risk management for both implementing agencies. ○ Will also finance activities related to development of critical policy and legislation in the SP sector and coordination between national and county governments on policy development for devolved functions such as childcare.

1.2 Key Results

The Project Development Objective (PDO) will be measured using the following PDO-level indicators.

- (a) Households participating in NICHE that report following MIYCN best practices¹ (Percentage)
- (b) Participating households that graduate from the Economic Inclusion Program (EIP)² (Percentage)
- (c) Participating adolescent girls (ages 10 to 18) with improved educational attainment³ (Percentage)
- (d) Eligible households who have received emergency cash transfers within nine months of a qualifying climate or weather event (Percentage)
- (e) Coverage and accuracy of ESR increased through On-Demand Registration (Number)

1.3 Beneficiaries

The project targets to benefit all 1.8 million existing NSNP households with improved delivery systems for GoK-financed cash transfers, 150,000 households will be supported under the NICHE program, 20,000 households will be supported under the adolescents' program and 50,000 households will be supported under EIP. There can be overlap between households that participate in various programs given there will be (intentional) geographic overlap across some counties, and households may be eligible and interested to participate in multiple programs. Beneficiary households of all programs must be poor but do not necessarily need to already be enrolled in NSNP to be eligible. Beneficiary households will be selected using ESR data to assess their poverty status along with other relevant eligibility criteria for each respective program. Beneficiaries of HSNP's shock responsive program will be pre-registered using ESR data to assess poverty status and residence in qualifying HSNP areas in ASAL counties.

1.4 Implementation Arrangements

Consistent with the ongoing KSEIP, the proposed project will retain two main IAs—the Ministry of Labor and Social Protection (MLSP) and NDMA within the MEACARD. Within MLSP, SDSP will have overall implementation responsibility for the proposed project. MLSP and NDMA staff at the national and local levels are responsible for the delivery of the cash transfer and complementary programs on the ground, in coordination with the county governments, where appropriate.

¹ Maternal, infant and young child nutrition practices (MIYCN), such as breastfeeding, complementary feeding, and other key nutritional behaviors.

² The criteria for graduation from the program include achieving all of the following: improved food security, establishing a sustainable and stable source of income, increased household assets, increased savings and access to credit, improved social inclusion, participation in all graduation interventions.

³ Educational attainment is measured as completing at least one additional year of schooling or, for those out of school at baseline, re-entering primary or secondary school.

Within MLSP, the National Social Protection Secretariat (NSPS) has the mandate for coordination of all SP policy and programs in the country. The Secretariat serves as the PIU for KSEIP2 and will have overall responsibility for project oversight and coordination, including E&S risk management under Component 4. This will particularly involve coordination among other line ministries, humanitarian actors, and county governments on the implementation of project activities across all components. The NSPS will also lead the systems investments for the ESR (Subcomponent 3a).

Three other directorates within MLSP will also have implementation roles in KSEIP:

(a) Directorate of Social Assistance (DSA): Under KSEIP2, DSA will lead the Subcomponent 3b investments and carry out activities related to recertification of CCTP beneficiaries, systems enhancements, two-way citizen engagement, and grievance redress for all programs led by SDSP. It will also ensure cash payments to the beneficiaries of NICHE, EIP, and the adolescent program (NSNP and non-NSNP beneficiaries) under Components 1 and 2, in coordination with the Directorate of Children's Services (DCS), Directorate of Social Development (DSD), and NDMA.

(b) DCS. For KSEIP2, DCS will lead all Component 1 activities, including NICHE and the new adolescent program, both at the national level and on the ground through county and subcounty officers, in collaboration with county and subcounty health and education officials. The DCS will also coordinate County Multisectoral Committees for implementation of Component 1.

(c) DSD. For KSEIP2, DSD will lead the implementation of Subcomponents 2a and 2c at the national and county levels. The DSD will coordinate the County Multisectoral Committees to support implementation of economic inclusion activities.

In addition, NSPS activities are supported by five community volunteer groups, Lay Volunteer Counselors (LVCs), Beneficiary Welfare Groups (BWCs), Community Drought and Food security Committees (CDFSCs), Child Protection Volunteers (CPVs), and Sub-location Validation Committees.

1.5 Justification for the Sexual Exploitation, Abuse and Harassment (SEA/SH) Prevention and Action Response Plan

An initial E&S assessment by the WB revealed that the KSEIP 2 is likely to exacerbate or introduce the risk of SEA/SH and other forms of gender-based violence (GBV), such as Intimate Partner Violence (IPV) resulting from enrollment in programs such as cash transfer (CT), Hunger and Safety Net (HSN), and related trainings and peer-to-peer exploitation, sexual abuse and harassment amongst adolescents; The risk is amplified by the developing capacity of SDSP and the implementing partners to manage the identified/emerging social risks and impacts such as the SEA/SH. Further under Component 2, KSEIP 2, targets to promote resilience and scale up livelihood diversification interventions to approximately twenty-five counties potentially increasing the participation of women and young adults. However, introducing livelihood programming without taking gender and cultural norms into account can inadvertently heighten the risk of violence against participants, particularly females. For example, domestic violence can increase if partners or family members feel threatened by or resentful of women's economic independence. As such, economic empowerment interventions must include provisions that support women's safety as well as components aimed at changing social norms and behaviors to reduce GBV related risks. In this context, the Sexual Exploitation Abuse and Harassment (SEA/SH) risk for this project is rated as **substantial** and the preparation of a SEA/SH Prevention and Response Action Plan is therefore a requirement for KSEIP 2. **Annex 1** captures this risk rating findings.

This plan outlines critical operational procedures and protocols that will be deployed to prevent, mitigate and respond all forms of (SEA/SH-GBV) risks that are project-related over the project life. These operational procedures and protocols pertain to how to: i) address SEA/SH allegations that may arise and procedures for preventing and responding to SEA/SH, ii) identify and investigate SEA/SH allegations, , and iii) disciplinary action for violation of code of conduct by KSEIP 2 workers.

2 Sexual Exploitation, Abuse and Harassment

The Inter-Agency Standing Committee (IASC) defines *Gender Based Violence (GBV)* 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. GBV includes acts that inflict physical, mental, sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life. GBV disproportionately impacts women and girls across their lifespan and takes many forms, including sexual, physical, and psychological abuse. It occurs at home, on the streets, in schools, workplaces, farm fields, and refugee camps, during times of peace as well as in conflicts and crises.

Sexual Exploitation: The United Nations defines Sexual Exploitation as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes. This includes, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of

another. In Bank financed operations/projects, sexual exploitation occurs when access to or benefit from Bank financed goods, works, non-consulting services or consulting services is used to extract sexual gain.

Sexual abuse is defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Sexual Exploitation and Abuse (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) is understood as unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature. SH differs from SEA in that it occurs between *personnel*/staff working on the project, and not between staff and project beneficiaries or communities. The distinction between SEA/SH is important so that agency policies and staff training can include specific instructions on the procedures to report on both. Both women and men can experience sexual harassment.

The World Bank Guidance Note defines four key areas of GBV/SEA/SH risks:

- SEA - exploitation of a vulnerable position, use of differential power for sexual purpose; actual or threatened sexual physical intrusion;
- Workplace sexual harassment - unwanted sexual advances; requests for sexual favors, sexual physical contact;
- Human trafficking - sexual slavery, coerced transactional sex, illegal transnational people movement; and
- Non-SEA - physical assault, psychological or physical abuse, denial of resources, opportunities or services and IPV.

Kenya's Definition of SEA/SH

The Kenya National Policy on Prevention and Response to Gender Based Violence (2014) describes forms of GBV (SEA/SH) are sexual violence, physical violence, emotional and psychological violence, harmful traditional practices, trafficking in persons and socioeconomic violence. Each of these forms of GBV manifests itself in several ways:

- *Sexual Violence*: Rape, attempted rape, defilement, incest, sexual abuse, sexual exploitation, forced prostitution, sexual violence as a weapon of war and torture and trafficking for sexual exploitation.
- *Physical Violence*: This includes physical assault, human trafficking and slavery.
- *Emotional/Psychological Violence*: Verbal abuse, insults/humiliation, isolation, sexual harassment, confinement and intimate partner violence all fall under emotional/ psychological violence.
- *Harmful Traditional Practices*: These include Female Genital Mutilation (FGM), Early Marriage, Forced Marriage, Infanticide and/or Neglect, widow inheritance and disinheritance.
- *Socio-Economic Violence*: This manifests itself through discrimination and/or denial of opportunities and services, social exclusion based on gender, obstructive legislative practice, wife/spouse inheritance and bigamy.

2.1 Contextual Risks

The risk factors that contribute to SEAH/SH in the project areas include the following.

- Conflicts in ASAL counties affecting children and women;
- Internally displaced persons due to floods in Tana River, Busia, exposes the vulnerable community members to GBV-SEA/SH;
- Poor access to water exposing women and girls to SEA/SH;
- Poor access to energy (fuel wood) for domestic consumption;
- Invasive alien plant species in ASAL counties (prosopis juliflora') posing insecurity issues that exacerbate GBV;
- Seasonal migration of pastoralists.

2.3 Legal, Policy and Institutional Framework for GBV (SEA/SH)

2.3.1 Legal and Policy Framework

Kenya has strong policy, legal and institutional frameworks for addressing GBV including:

- *The Constitution of Kenya, 2010*. Article 10(2)(b) of the Constitution recognizes human dignity, equity, social justice, inclusiveness, equality, human rights, non-discrimination, and protection of the marginalized as part of national values and principles of governance. Article 28 of the Constitution guarantees human dignity while Article 29 guarantees every person the freedom and security and this includes the right not to be subjected to any form of violence from either the public or private sources and not to be treated or punished in a cruel, inhuman, or degrading manner.
- *The National Policy for the Prevention and Response to Gender Based Violence - 2014*, constitutes the guidance for the prevention and response to GBV. The policy seeks to among other objectives, improve enforcement of existing laws to reduce, curb or prevent SEA/SH.
- *County Government Policy on Sexual and Gender Based Violence - 2017*. The policy aims at ensuring that every county government can address SEAH issues. This policy provides a framework to counties to recognize SEAH as a human rights violation and to provide resources to mitigate these risks.
- *Legislative Framework on Sexual and Gender Based Violence for County Governments - 2017*. This model law is designed to provide measures for awareness, prevention, and response to sexual and GBV, to provide for the protection, treatment, counselling, support, and care of victims of SEA/SH, and for connected purposes.
- *The Sexual Offences Act, 2006*. This Act makes sexual abuse and exploitation a crime in Kenya and provides for protection against sexual offenses. Section 5 deals with conviction of perpetrators while Sections 6 and 43, address intentional and unlawful acts and includes instances where people misuse their power to commit sexual offenses. Section 23(1) of the Act makes sexual harassment an offence punishable under the law for a jail term not less than 3 years or a fine of not less than KShs.100,000) or to both.
- *The Employment Act, 2007*. The Act governs employment in Kenya and sets out the rights and obligations between an employer and an employee. Section 6 of the Act defines sexual harassment and makes it a requirement for an employer with 20 or more employees to have a policy statement on sexual harassment and ensure that every employee knows about it.
- *The Penal Code, Cap 63 Laws of Kenya*. The Penal Code does not explicitly address GBV offences. Sections 250 and 251 on protects against assault and causing actual bodily harm.
- *Kenya Social Protection Policy (2023)*. It provides a policy framework that addresses the country's evolving and growing Social Protection needs.
- *Children's Act No. 2 of 2022*. Designed to safeguard the rights and welfare of children.
- *Older Persons Bill, 2024*, currently under review, aims to enhance the rights and welfare of older individuals, including protection against abuse.
- *The Persons with Disabilities Act*, enacted in 2003 and revised 2019, is the primary law in Kenya governing the rights and welfare of persons with disabilities.
- *Data Protection Act 2019* which regulates the collection and processing of personal data.

2.3.2 National Guidelines and Protocols on Gender Based Violence

Key national guidelines and protocols on GBV include:

- *National Guidelines on the Management of Sexual Violence (2014)* details the management of sexual violence and outlines the steps for the treatment of sexual violence survivors, including the preservation of evidence and issues of psycho-social support
- *National Monitoring and Evaluation Framework* towards the Prevention of and Response to Sexual and Gender Based Violence in Kenya (2016) sets out indicators for monitoring and evaluation of the different sectors supposed to prevent and respond to sexual violence.
- *National Health Sector Standard Operating Procedures on Management of Sexual Violence in Kenya 2014* outlines the minimum procedures for the management of GBV (SEA/SH) in the health sector and related referral mechanisms for psychosocial, legal, and

other social support services; however, the roll-out of standards and procedures articulated at the national level remains limited at the county level.

2.3.3 International and Regional Treaties and Conventions

Kenya has ratified Treaties and Conventions that govern GBV including: the Universal Declaration of Human Rights (UDHR, 1948), the International Covenant on Civil and Political Rights (ICCPR, 1976), the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984), the United Nations Convention on the Rights of Child (CRC, 1989), UN Resolution 1325 (2000), the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (2000), the ILO Convention 182 on the Worst Forms of Child Labor; and the Optional Protocol on the Convention of the Rights of the Child on Child Trafficking, Child Prostitution, and Child Pornography and the African Charter on the Rights and Welfare of the Child. Details of these and other international frameworks applicable to GBV are contained in **Annex 2**.

2.3.4 Institutional Frameworks

A number of key institutions are involved in management of SEA/SH and these include: Ministry responsible for Gender that provides overall leadership and coordination in policy implementation; National Gender and Equality Commission provides oversight on the implementation of GBV policies by state and non-state actors; Health Ministry delivers SEA/SH health related services at national and county levels; Security Ministry offers security, investigation and arrest of potential and actual perpetrators of SEA/SH; the Attorney General's Office administers justice for SEA/SH survivors; Directorate of Public Prosecutions undertakes investigation and prosecution of SEA/SH cases; Judiciary -courts deals with GBV crimes; the Labour Ministry ensures that employers and employees adhere to legal provisions on SEA/SH; Public Service Commission develops code of conduct for public service officers to follow that includes SEA/SH; and lastly, County Governments establish facilities and infrastructure necessary for SEA/SH responses at the County level. More details on the institutional framework for management of SEA/SH can be found in **Annex 3**.

3 Potential SEA/SH Risks in KSEIP 2

3.1 Community Level SEA/SH Risks

Some of the KSEIP 2 Components, such as economic empowerment and cash transfer, can alter relations including power structures in communities that place women, girls, and boys in situations where they may be exposed to SEA/SH social impacts. Community engagement undertaken in August and September 2024 involving 2,153 community members in 10 counties, namely, Kilifi, Tana River, Busia, Bungoma, Baringo, Samburu, Isiolo, Kitui, Kericho and Migori, indicate that implementation of KSEIP 2 can trigger potential negative social impacts and risks including: intimate partner violence or violence from other family members in order to gain control of cash transfers or other project benefits; intra- and inter- household and community tension or conflict due to inclusion or exclusion from accessing project benefits and opportunities; GBV/SEA in exchange for selection into the project or project benefits; peer-to peer teenage/adolescent sexual abuse, exploitation and harassment; sexual abuse and child defilement by guardians/caregivers, particularly, of PWDs; abuse of older persons receiving project benefits (e.g. neglect of sexual needs, forced sexual acts and blackmailing them into sexual activities); abuses at cash-transfer interface where vulnerable beneficiaries (women) get exploited by project workers; sexual exploitation of community members by Service Providers who seek sexual favors in exchange for registration to benefit from cash transfer for livelihood support and underage or school going girls may elope with project workers or be married off to project workers in exchange of resources to the girls family. There is the potential of SEA/SH risks for female (but also male) members of the community who are seeking employment and/or services provided by the project and are given by project employers in exchange for sex. Sexual harassment and other forms of abusive behaviour exacerbated by traditionally male working environment which might potentially compromise the wellbeing and safety of vulnerable groups of workers and the local communities while adversely affecting project performance. Misinformation or lack of information throughout the project's components towards the different community members especially those with less agency and power. Further details on community level SEA/SH risks are contained in **Annex 4**.

3.2 Potential SEA/SH Risks to Project Workers

3.2.1 Categories of Project Workers

As outlined in the KSEIP 2 Labour Management Procedures (LMP), the project will engage four (4) categories of workers: direct, contracted, primary supply and community workers. The SEA/SH Prevention and Response Action Plan will apply to all these categories of project workers:

Direct workers

Project Management Unit (PMU): A PMU will be established within the SDSP to manage the project. The PMU will have a dedicated Project Coordinator (PC) with overall responsibility for the effective functioning of the Project. The Unit will be staffed by Government employees, with skills to undertake key functions such as financial management, procurement, E&S risk management and communication and Monitoring and Evaluation (M&E). Additional staff may be seconded from other Ministries and government agencies (such as the Department of Occupation Safety and Health) to strengthen the E&S risk management capacity within the project.

Civil Servants from Ministries, Agencies and County governments and staff of development partners on the project: All Government staff to be involved in the project (SDSP, NDMA, MoA,-Community Agricultural Extension Officers, MoH, MoE, Meteorological Department, other Disasters Risk Management Agencies, National Registration Bureau (NRB) and Civil Registration Services (CRS) and staff from the various County Governments departments). Under SDSP, there are two departments (the Directorate of Children’s Services (DCS) and the Directorate of Social Development (DSD) having staff at both national and local levels and are responsible for the delivery of the cash transfer and complementary programs on the ground, in collaboration with the county governments, as appropriate. The NDMA has staff at both the national level and in the 23 ASAL counties in which it operates. The staff are responsible for the delivery of HSNP initiatives together with county governments.

Contracted Workers

Service providers such as consultants and contractors (e.g. payment service providers, mentors/trainers, Technical Assistance (TA) Providers etc.): The PMU will be supported by national and/or international consultants and contractors, who will be hired on need-basis. The consultants/contractors will be assigned to various functions including capacity building for project staff, policy formulation, documentation of lessons learnt to inform project planning, payment service providers, mentors/trainers for the various categories of project beneficiaries.

Primary Supply Workers

A “primary supply worker” is a worker employed or engaged by a primary supplier, providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. Under the project supplies such as office furniture, vehicles, Information, Education and Communication (IEC) materials, ICT equipment will be required to enhance the functioning of the PMU and project implementation at both the national and county level. The Project will seek primary suppliers through contractors who will be commissioned on localized sub-project contracts, necessitating the engagement of workers of primary suppliers in the project.

Community Workers

There are five KSEIP 2 Community-Level Volunteer Committees engaged by the project, and these are essentially citizens who volunteer their time and skills to support delivery of social protection services within their respective communities under the direction of the Social Development Officer, Children’s Officer and NDMA’s Field monitoring officers, without remuneration. Community volunteer groups are discussed in detailed under **Annex 9**.

Lay Counselling Volunteers (LCV) who support individuals and families in need of guidance and counselling. There are a total of 2401 LVCs across the 47 counties (7 LVCs per sub-county).

Child Protection Volunteers (CPV) whose main responsibility include promoting and protecting the rights and welfare of children in the community, providing guidance to children in need of care and protection and identification and reporting of child protection cases and emerging trends to the SCCO for intervention.

Community Drought and Food Security Committees (CDFSCs) are led by the NDMA and supported by both national and international organizations. Their role includes among others coordinating the implementation of national drought policies at the county level, managing emergency responses and mobilize resources during droughts and ensuring early warning information is shared with local populations.

Beneficiary Welfare Committees (BWCs) are essentially a group of representatives of beneficiaries of Cash Transfer programs at the Locational level. They help to increase the programme efficiency, accountability, transparency and awareness; and serve as a key link between the beneficiaries and the programme officers.

Sub-Location Validation Committees (SLVC)- This committee operates under NDMA with each committee comprising 10 persons. Among other duties, the committee sensitizes communities on the validation process, mobilizes community members to attend validation public barazas, and identifies inclusion, exclusion errors and missed households.

SEA/SH risks to Project Workers Identified during Consultation

3.2.2 Potential SEA/SH Risks to Project Workers

Document review coupled with consultations with staff of the implementing institutions and partners in August - September 2024, at national, county and sub-county levels identified potential SEA/SH risks to project workers. Participants included staff from the following institutions (i) SDSP, (ii) NDMA, (iii) UNICEF (iv) WFP v) USAID vi) Ministry of Education (vii) Ministry of Health (viii) National Environment Management Authority (ix) Several NGOs (x) Ministry of Interior (xi) National Council for Persons With Disabilities. In the context of KSEIP 2, potential SEA/SH risks for project workers at various levels include: Workplace Harassment: (i) sexual harassment within teams: project workers, including contractors and government officials involved in KSEIP 2, may face sexual harassment from colleagues, supervisors, or other project staff in the context of project resources and opportunities such as field trips and workshops. This includes unwanted sexual advances, inappropriate comments, or coercive behavior within the workplace (ii) gender-based harassment: female project workers, in particular, may be more vulnerable to sexual harassment due to gender imbalances in leadership or power structures within the workplace. Details of potential SEA/SH risks to project workers are presented in **Annex 5**.

4 Preventing and Responding to SEA/SH Risks in KSEIP

Necessary mechanisms will be put in place by KSEIP 2 to proactively combat SEA/SH of all kinds that may emerge during project implementation in line with the World Bank SEA/SH Good Practice Note, and the GoK policies. The strategies for mitigating SEA/SH based on the risk rating are as follows.

4.1 SEA/SH Code of Conduct

A Code of Conduct (CoC), an important tool for effective management and reporting of SEA/SH cases, has been developed. It defines SEA/SH requirements and expectations that will be part of contracting. It incorporates codes of conduct for project workers to prevent risks of SEA/SH from occurring and establishes procedures for managing related grievances. Contractors, service providers and staff are prohibited from soliciting for sexual favors in exchange for services.

The CoC prohibits sexual relationship with anyone under the age of 18. It also prohibits project workers from engaging in any form of sexual exploitation or abuse- e.g. exchanging money, employment, goods, services for sex or sexual favor or making promises or favorable treatments dependent on sexual acts or other forms of humiliating, degrading or exploitative behavior. Survivors will be accorded support in the steps and protocols required for reporting until the matter is resolved. The Code of Conduct is contained in **Annex 6**. The CoC contains protocols for confidentiality and information sharing.

Treatment and Counselling Procedures are contained in **Annex 7**. These Procedures are aimed at protecting survivors from further harm and are to be used by a trained and certified counsellor or medical service provider.

Information and communication: A communication strategy and materials on SEA/SH will be developed to provide information on preventing and managing SEA/SH risks and the range of SEA/SH support services available for referral (healthcare, protection, psychosocial), information on protection of whistleblowers. Encouragement will be given to report suspicious SEA/SH cases through a hotline number, GCM or citizen engagement/feedback mechanism that will be provided.

Mapping SEA/SH Support Services: Identification and mapping of SEA/SH service providers will be undertaken in project counties as part of the project including a referral pathway linking survivors and those at risk of SEA/SH to support services including protection, psychosocial

support and emergency medical services for survivors of SEA/SH. These support services, entail: (i) accessible information on services available to survivors of SEA/SH; (ii) a mechanism that is both accessible, effective, responsive including on health, social welfare, police, prosecutorial, and other services to redress cases of SEA/SH; (iii) specialized facilities, including support mechanisms for survivors of SEA/SH; and (iv) effective rehabilitation and reintegration programs for perpetrators of SEA/SH. A sample of SEA/SH Referral Centres in Kenya is contained in **Annex 8**. This list was obtained from UN Women (UN Women, 2019) and from The Joint Programme on the Prevention and Response to Gender Based Violence (JP-GBV) that brings together 14 Government Ministries and 14 UN agencies, and other stakeholders in Kenya.

Accountability: The Code of Conduct will integrate accountability provisions requiring government staff, community workers and volunteers to use power responsibly by taking account of, giving account to, and being held to account. Accountability will drive all the KSEIP's actions on SEAS/H and will operate on three levels: individual accountability, leadership accountability, and organizational accountability:

Individual Accountability: All the Project personnel are accountable for regulating their conduct at all times in a manner befitting their status.

Leadership Accountability: A team in the National Social Protection Secretariat of the SDSP is in place to promote and monitor social safeguards, including SEA risks. The Principal Secretary (PS) is accountable for setting the tone from the top and guiding in preventing and responding to SEA/SH in the Project. He will lead in creating an organizational culture of zero tolerance based on care, respect, integrity, trust and accountability.

Organizational Accountability: The Project is accountable to act on complaints from staff, beneficiaries and the community – that is, to provide support to survivors; conduct impartial and confidential investigations; apply sanctions within the scope of its authority; cooperate with national legal systems as appropriate so as to help secure fair recourse. The State Department has an organizational accountability to work closely with implementing partners to manage shared risks and address common challenges.

Project design: Several measures are proposed in the project design to address the risks of creating opportunities for project actors to sexually exploit and abuse project beneficiaries. These are: (i) proposed digital infrastructure improvement for service delivery, (ii) targeting beneficiaries using the ESR data to assess poverty status, gender categorisation, and geographic criteria to prioritize poorest counties (iii) exploring better alternative payment channels as recommended by the stakeholders.

Community engagement: Communication campaigns will be held to change harmful practices such as *disco-matanga* and abuse of the elderly that lead to SEA/SH. Central to this, will be mentorship on soft skills as part of the community's economic empowerment/livelihood programs to foster increased understanding of SEA/SH risks and consequences. In line with the recommendations from the community engagements, the project will engage with the whole community, including men, boys, and traditional leaders, who can be influential allies. Included in this will be programs that provide spaces for women to come together to develop their self-confidence, leadership skills, and supportive relationships with other women. As part of these programs will be the creation of safe spaces/adolescent development clubs to provide safe places for positive social interactions along with vocational and life skills training for adolescent girls.

Training: develop and deliver continual training to staff and community to equip them with knowledge and skills on preventing and responding to SEA/SH. The training will integrate understanding of the Code of Conduct, SEA/SH, accountability and response framework including the referral processes, the utilization of the reviewed GCM under the project with a separate channel to manage SEA/SH-related complaints to enable reporting in a safe, confidential survivor-centric manner. Cases of SEA/SH can be reported through the general Project GM – through the suggestion box, or through the GM Hotline Operator, phones calls, emails etc. to be developed). The project GM will ensure all incidents of SEA/SH reported either through the general GM system that is related to the new project are relayed to the PMU and Bank within 24 hours.

Security of workers: There are security concerns in some counties. Engagement with the project teams from NDMA and SPS, indicated that female staff are sometimes excluded from traveling to risky areas for activities such as during beneficiary registration. Further, security concerns and unfriendly weather situations such as flooding can hinder staff from physically accessing beneficiaries and undertaking project monitoring. The design of the project will provide alternative methods of stakeholder engagement and monitoring during such times.

Technical assistance: Environmental and Social Specialist will be on board to support SEA/SH risk management.

4.2 Monitoring, Evaluation and Lessons Learnt

To implement this SEA/SH Prevention and Response Plan, a monitoring and evaluation framework will be developed to monitor and report on the prevention and response actions of the plan; document/log all SEA/SH cases including status of cases (ongoing, completed, closed, etc.). Training of project staff at various levels as well as sensitization of the community will be critical to the success of the Plan.

4.3 Leadership and Coordination

National level

SDSP will hire qualified, experienced and full-time Environment, Health and Safety (EHS) Specialist and Social specialist. The social specialist will possess a strong background, in social inclusion, grievance, and GBV management. NDMA will also hire an EHS specialist and Social Specialist as part of its PIU and nominate E&S focal points in each participating county. DSA shall hire a Grievance Officer since the project GM shall be domiciled at the DSA. Details on leadership and coordination are provided in **Annex 9**.

4.4 Grievance Redress Mechanism

Under KSEIP 1, two GMs were operated under the NSNP (Grievance and Case Management - GCM) systems and the Hunger and Safety Net Program (HSNP) Case Management System (CMS) by NDMA. These Grievance Mechanisms emphasizes on beneficiary case management that handle common programme errors such as error in data collection, data entry or implementation of processes, and issues related to rights that can be logged into the MIS. There are no mechanisms to handle non-case grievances such as labour-related grievances, inadequate stakeholder engagement, accessibility grievances, discrimination and marginalization grievances, quality of service, transparency and accountability, as well as confidential aspects such as SEA/SH. SEA/SH grievances at community level are being handled by Beneficiary Welfare Committees (BWCs) or a panel of elders in conjunction with chiefs, who counsel households, caution perpetrators and take measures against them. The project will ensure that a mechanism for receiving and handling SEA/SH cases is operationalized before the project becomes effective.

4.4.1 Review of NSNP and HSNP Grievance Mechanisms

A recent review of the two GMs done by stakeholders and coordinated by SDSP in 10 counties revealed that, to be effective, the GM needs to be strengthened to provide structures up to the village level and provide various channels of reporting. A further review undertaken by the World Bank also recommended adoption of various channels of reporting SEA/SH, need to define ineligible grievances and principles (respect, safety and security, confidentiality, and non-discrimination) to guide the revision, and response and processing timelines. Details of the two Grievance Mechanisms under KSEIP I, the review and recommendation for strengthening are presented in **Annex 10**.

4.4.2 Proposed Reporting Process and Protocols for Receiving Complaints Related to SEA/SH

The reporting process and protocol in the CoC upholds confidentiality of information shared by the survivors. Through this process, the SEA/SH survivors and others will know to whom they should report and what sort of assistance to expect from the health, social welfare, law enforcement, legal and justice sectors.

The SEA/SH-responsive GM for KSEIP 2 has not yet been agreed upon. Once completed, it will have a separate channel to manage SEA/SH-related complaints to enable reporting in a safe, confidential survivor-centric manner. The proposed steps below (contained in the CoC in Annex 5) could be considered in the KSEIP 2 GM for assistance given to SEA/SH survivors:

- The person who receives the complaint will notify the SEA/SH Focal Point to be appointment. The Focal Point should have relevant experience and knowledge in SEA/SH. The information to be collected from the person reporting will be: (a) age and gender, (b) nature of the complaint in the survivor's own words, and whether (c) the perpetrator was known to him/her and is related to the project (d) were offered referral to services.

- The NFP will arrange for any required emergency support and concurrently refers the case to a SEA/SH service provider.
- The service provider to contact NPC who will report any serious SEA/SH incident to the Bank within 24 hours.
- The NFP will refer the case to the SEA/SH Complaints Team to be appointed under the KSEIP 2 GM, to review and collectively agree upon the appropriate actions to be taken and sanctions.
- The case can be referred to the police as appropriate and according to the law.
- Upon resolution, the Focal Point and SEA/SH Services Provider will advise the survivor that it has been resolved, who in turn advise the GCM operator.
- The GCM operator notes the resolution and closes the case.

The SEA/SH Treatment and Counselling Procedures aimed at protecting survivors from further harm and to be used by a trained and certified counsellor or medical service provider are provided in **Annex 10**.

5 KSEIP SEA/SH Action Plan

Table 3 below provides a summary of the prevention and response actions for SEA/SH. The Plan details the operational measures that will be put in place to prevent and respond to project related SEA/SH including managing related grievances. The KSEIP will allocate resources (human and financial) to implement the SEA/SH action plan, engage an Environmental and Social Specialist with a strong social background and adequate expertise on GBV-SEA/SH management, and supported by, GBV focal persons. The GBV-SEA/SH related role of the Specialist are captured under Annex 9. The estimated budget is KES 4,000,000.

Table 2: KSEIP SEA/SH - GBV Prevention and Response Action Plans

	Objectives	Activities / Steps to be taken to Address SEASH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators
1	Coordination, Networking and Partnership					
	A SEA/SH project-level structure is established with the Principal Secretary (PS) and KSEIP National Project Coordinator (NPC) supported at senior management and technical-levels to lead, oversee, and deliver on SEA/SH prevention and response outcomes.	<ul style="list-style-type: none"> i. PS formerly officially designates SEA/SH Focal Points at national project level and county level. ii. Train management project team at national and county staff on SEA/SH. iii. Mobilize project partners through their E&S Focal Points to be in the lead in SEA/SH management for the components they support. iv. SEA/SH issues are regular agenda items in PCU meetings as it is a key result area that will determine the success of the project. 	Start at inception phase by quarterly sessions.	Principal Secretary, National Project Coordinator Social specialists and E&S Focal Points.	National Project Coordinator	<ul style="list-style-type: none"> i. A functional SEA/SH management structure operational at the national and county levels. ii. KSEIP 2 NPC takes lead on prevention and response and coordinates with E&S Focal Points. iii. Partnerships established. iv. Number of project meetings with partners. v. % of cases/issues reported and followed up.
2	Mapping out SEA/SH Prevention and Response Service Providers					
	To identify and analyze quality of available SEA/SH support services in Project Counties and sub-counties.	<ul style="list-style-type: none"> i. Continual updating through desk reviews and calls to identify and map the existing services, gap analysis, entry points for survivor assistance, and local actors working on the prevention of and/or response to SEA/SH. ii. Analyze the services for survivors available in all project locations and assess their quality as per standards, including health care, psychosocial support, police, and legal/justice services. 	Before commencement of project activities.	Social specialists and E&S Focal Points, County/Sub-county Social Development Officers and Children Officers, Gender Officers.	Social Specialists National Focal Point Unit (NFPU)	SEA/SH Service providers mapping available. Number/type of GBV/SEA/SH prevention services available.
3	Capacity Building					
	Enhance the capacity of community, local leadership and project workers to effectively prevent and respond to SEA/SH.	<ul style="list-style-type: none"> i. Provide detailed and comprehensive awareness to beneficiaries and local leaders, induction to project participants and training to project workers on SEA/SH procedures and protocols ii. Offer training for community-based organizations, traditional and faith leaders, media, and other stakeholders on innovative approaches for prevention of, and response to SEA/SH. iii. Prepare project SEA/SH code of conduct. 	Before commencement of project activities and continuous throughout implementation.	Social Specialists and E&S Focal Points, County/Sub-county Social Development Officers and Children Officers, Gender Officers.	NFPU and county coordinators	<ul style="list-style-type: none"> i. Protocols and operational procedures established. ii. Number of training sessions & response drills conducted. iii. Leadership, Project managers & staff trained to prevent and respond to incidents.
4	Prevention and Awareness					
	SEA/SH is prevented and early detection of any practices that may	<ul style="list-style-type: none"> i. Develop IEC materials to educate and raise awareness on SEA/SH. ii. Develop protocols for preventing and responding to SEA/SH. 	During the inception phase	Social Specialists and E&S Focal Points, County/Sub-county Social Development	NFPU and County Coordinators	<ul style="list-style-type: none"> i. IEC materials.

	Objectives	Activities / Steps to be taken to Address SEASH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators
	lead to SEA/SH enhanced by eliminating, or addressing factors that lead to SEA/SH.	iii. Involve men and boys in initiatives that will bring sustainable solution for SEA/SH	and throughout implementation.	Officers and Children Officers, Gender Officers.		ii. Protocols. developed. iii. Project workers and community protocols on SEA/SH.
5	Response and Support					
	To ensure that every /survivor is facilitated to access immediate, quality assistance (medical care, psychosocial support, legal assistance, reintegration support.	i. Identify community-based safe shelters with the right personnel and outreach services for the protection of survivors of SEA/SH. ii. Develop a SEA/SH referral pathway. iii. Facilitate survivors to access quality GBV service providers in line with their wishes.	Across the project life cycle.	Social Specialists, SEA/SH Management Team	National Project Coordinator	i. Communities that are well informed survivors. ii. A functional referral pathway community and project workers.
6	Grievance Management (GM) for SEA/SH Responsive Reporting					
	Survivors of SEA/SH easily reach out and report violence against them and promptly receive supportive response.	i. Review and amend the NSNP and NDMA Grievance Mechanisms and operationalize a GBV-responsive GM before commencement of project activities.. ii. Guide community and project workers on channels of reporting cases of SEA/SH in the GM. iii. Create awareness on disciplinary actions against anyone that breaches the Code of Conduct .	Throughout the project life	Social Specialists and GM Officer E&S Focal Points County/Sub-county Social Development Officers and Children Officers, Gender Officers	National Focal Point and County Coordinators	A SEA/SH-responsive Grievance Mechanism
		i. Regularly update the information sharing protocol to enhance who is receiving information and how best it is used. ii. Update disclosure and reporting guidelines / protocol for SEA/SH with a provision for survivor protection and assistance.	At project preparation phase and mid-term	National Project Coordinator Social Specialists and GM Officer E&S Focal Points	NFPU and County Coordinators.	Number and nature of guidelines and protocols
		i. Review logs for SEA/SH documentation to ensure it follows standards for documenting SEA/SH cases. ii. Identify and review culturally appropriate community-based reporting mechanism to facilitate reporting.	Quarterly	National Project Coordinator Social Specialists and GM Officer E&S Focal Points	National Project Coordinator	Number of SEA/SH cases documented Number of referrals of SEA/SH in project areas % of SEA/SH complaints not resolved Number of cases closed, and the average time to resolve
7	Monitoring, Evaluation and Learning					
	To measure how well this Action Plan is being implemented,	i. Develop indicators to assess project implementation. ii. Develop a reporting template for documenting cases of SEA/SH categorized in various forms	Quarterly and annually	National Project Coordinator	SEA/SH Management Structure.	i. Number of issues reported on SEA/SH ii. Shift in attitude of project workers

	Objectives	Activities / Steps to be taken to Address SEASH risk	Timelines	Responsible	Monitoring (Who will monitor)	Output Indicators
	identify and address any issues that might emerge, to improve outcomes.	i. Quarterly and annual reporting to measure effectiveness of the various support systems to respond to SEA/SH. v. Conduct mid-term and end-term SEA/SH risk assessment .		Social Specialists GM Officer E&S Focal Points		iii. Quarterly and annual reports. iv. Mid- and end-term SEA/SH risk assessment reports.
		TOTAL				

Annexes



SEAH Action Plan
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