



**MINISTRY OF  
ENVIRONMENT,  
CLIMATE CHANGE &  
FORESTRY**

**STATE DEPARTMENT FOR FORESTRY (SDF)**

**KENYA WATERSHED SERVICES IMPROVEMENT PROJECT (KEWASIP)  
(P178850)**

**SEXUAL EXPLOITATION, ABUSE AND SEXUAL-HARASSMENT (SEA-SH)  
PREVENTION AND RESPONSE PLAN**

**NOVEMBER 2025**

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## ABBREVIATIONS

ASAL	Arid and Semi-Arid Land
BETA	Bottom-Up Economic Transformation Agenda
CALM	Climate Action through Landscape Management PforR
CBD	Convention on Biological Diversity
CCDR	Country Climate and Development Report
CEC	County Environment Committee
CFA	Community Forest Association
CIF	Climate Investment Funds
CoG	Council of Governors
CPCU	County Project Coordination Unit
CPSAC	County Project Steering and Advisory Committee
CRI	Climate Resilience Indicator
CSA	Climate Smart Agriculture
DRSRS	Directorate of Remote Surveys and Resource Sensing
DOSHS	Directorate of Occupational Safety and Health Services
EHSGs	Environmental, Health, and Safety Guidelines
EIA	Environment Impact Assessment
EMCA	Environmental Management and Coordination Act
ESF	Environment and Social Framework
ESIA	Environment and Social Impact Assessment
ESMP	Environment and Social Management Plan
ESSs	Environment and Social Standards
FAO	Food and Agriculture Organization
FCMA	Forest Conservation and Management Act

FFS	Farmer Field Schools
FLLOCA	Financing Locally Led Climate Action
GEF	Global Environment Facility
GHG	Greenhouse Gas
GoK	Government of Kenya
GRS	Grievance Redress Service
Ha	Hectare
ICT	Information and Communication Technology
IDA	International Development Association
IEMP	Integrated Ecosystem Management Plans
IP	Indigenous People
IPF	Investment Project Financing
IPPF	Indigenous People's Planning Framework
IWC	Integrated Watershed Committees
IWUA	Irrigation Water Users Associations
KAPSLMP	Kenya Agricultural Productivity and Sustainable Landscape Management Project
KCSAP	Kenya Climate-Smart Agriculture Project
KEFRI	Kenya Forestry Research Institute
KEWASIP	Kenya Watershed Services Improvement Project
KFS	Kenya Forest Service
KES	Kenyan Shilling
KWS	Kenya Wildlife Service
KWSCRIP	Kenya Water Security and Climate Resilience Project
KWTA	Kenya Water Towers Agency
M&E	Monitoring and Evaluation

MECCF	Ministry of Environment, Climate Change and Forestry
MoA	Ministry of Agriculture
MRV	Measurement, Reporting, And Verification
MTP	Medium-Term Plan
NBEs	Nature-Based Enterprises
NCCAP	National Climate Change Action Plan
NDC	Nationally Determined Contributions
NECC	National Environmental Complaints Committee
NEMA	National Environment Management Authority
NET	National Environment Tribunal
NGEC	National Gender and Equality Commission
NLERS	National Landscape and Ecosystem Restoration Program Strategy 2023-2032
NMK	National Museums of Kenya
NPC	Nature, People, and Climate
NPCU	National Project Coordination Unit
NPSC	National Project Steering Committee
NTAC	National Technical Advisory Committee
OESRC	Operations Environmental and Social Review Committee
OHS	Occupational Health and Safety
PAD	Project Appraisal Document
PDO	Project Development Objective
PES	Payment for Ecosystem Services
PF	Process Framework
PFM	Public Finance Management
PFMP	Participatory Forest Management Plan

PPP	Public-Private Partnership
REDD	Reducing Emissions from Deforestation and Forest Degradation
RMP	Resource Management Plan
SCMP	Sub-Catchment Management Plan
SDA	State Department for Agriculture
SDECC	State Department for Environment and Climate Change
SDF	State Department for Forestry
SDI	State Department for Irrigation
SDW	State Department for Wildlife
SDWS	State Department for Water and Sanitation
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SESA	Strategic Environmental and Social Assessment
SFM	Sustainable Forest Management
SLM	Sustainable Land Management
SLWM	Sustainable Land and Water Management
THS-UCP	Transforming Health Systems for Universal Care Project
ToR	Terms of Reference
VMG	Vulnerable and Marginalized Groups
WB	World Bank
WCCPC	Water Catchment Conservation and Protection Committee
WIBA	Work Injury Benefit Act
WMP	Watershed Management Plans
WRA	Water Resources Authority
WRUA	Water Resource Users Association

## **1. Introduction**

### **1.1 Background for the KEWASIP**

The Kenya Watershed Services Improvement Project (KEWASIP) responds to the critical need to restore degraded landscapes, strengthen the management of Kenya’s natural resources, and enhance ecosystem services to improve climate resilience and provide access to diversified livelihoods in Kenya. Kenya, officially the Republic of Kenya, is a country in East Africa with an estimated population of 54 million. Over the past decade, Kenya has seen substantial economic growth. The country’s gross domestic product (GDP) grew at an average of 4.8 percent (2015–2019), with the poverty rate decreasing from 47 percent to 34 percent. Kenya’s natural resources are central to the employment, food security, and energy of its 54 million people. They support over 80 percent of livelihoods, make up 35 percent of total wealth, 42 percent of GDP, and nearly 70 percent of jobs. The agriculture sector employs 48 percent of workers and is highly climate-sensitive, with limited labor shifting to other sectors.

#### **1.1.1 Land Degradation**

Kenya’s Land Assessment Report highlights that high levels of land degradation are likely to occur on approximately 88.6 percent of Kenya’s total land area (approximately 38.8 million hectares). Land is driven by a combination of deforestation, overgrazing, soil erosion, poor agricultural practices, and population pressure leading to the declining agricultural productivity, biodiversity loss, livelihoods disruptions, and conflict particularly over grazing land. Specifically, the degradation of water catchment areas has reduced water retention of upper catchments or water towers, exacerbating the effects of both droughts and floods, thereby reducing the availability of water for agricultural, industrial, and domestic uses.

#### **1.1.2 Climate Change**

Climate change exacerbates the effects of land degradation, particularly in arid and semi-arid regions, where droughts and extreme weather worsen land degradation posing a significant economic and social risks. For instance, the 2021–2023 droughts left 6.4 million people food insecure which increased migration and potential conflict. On the other hand, floods, such as in

2018, impacted 350,000 people and displaced 211,188 while increasing waterborne diseases.

### **1.1.3 Gender Equity and Women Empowerment**

The Project seeks to empower women by addressing barriers, particularly in sustainable land and natural resource management, and environmental conservation and restoration efforts. Women's empowerment has been linked with improved agricultural productivity and natural resource conservation. However, women's potential to support improved sustainable agricultural production, landscape restoration, and natural resource management is curtailed by social norms, which consign them to subsistence production, domestic labor and caregiving tasks; as well as limited access to land, finance, information and skills development opportunities. For example,

- i. 6 percent of women lack access to formal financial services, and only 25 percent own agricultural land, compared 4 percent and 31 percent of men, respectively. Consequently, women face greater constraints in making climate-smart investments.
- ii. Women's voices are often neglected in the design and delivery of agricultural extension, land and natural resources, management, and community-based environmental conservation and restoration interventions.
- iii. Women's representation in natural resource management bodies at the community level is expected to be lower than the minimum requirement of 33 percent.
- iv. 3.2 percent of firms are owned majority by women, while 18.1 percent have women in top management positions. Additionally, the average percentage of women in permanent full-time jobs is 31.6.

## **1.2 Project Development Objective**

The Project Development Objective (PDO) is to expand the area under sustainable land and watershed management and to improve livelihoods of communities in the project areas.

The KEWASIP PDO level Indicators are as follows:

### **1.2.1 Landscape Management**

- PDO1: Hectares of terrestrial and aquatic areas under enhanced conservation and management.

- PDO1a: Private and Community lands with SLWM applied and under improved management (Hectare).
- PDO 1b: Rehabilitation of degraded and enhanced management of public lands (Hectare).
- PDO 2: Net GHG emissions per year (tCO<sub>2</sub>eq/year).

### 1.2.2 Livelihoods

- PDO 3: Beneficiaries with enhanced resilience to climate risk (of which female).
  - PDO 3a: Beneficiaries adopting at least one additional SLWM practice (of which female, youth) (Number).
  - PDO 3b: Beneficiaries participating in livelihood diversification and income generating activities (of which female, youth) (Number).

### 1.3 Project Components

The KEWASIP will be implemented through three components and their accompanying sub-components. The Ministry of Environment, Climate Change and Forestry (MoECCF) is the lead implementing ministry for the Project. The Project will be executed through both the National Project Coordination Unit (NPCU), established under the State Department for Forestry (SDF), and the County Project Coordination Units (CPCU), established for each county where the Project is being implemented.

*Table 1: Summary of KEWASIP components and key activities.*

Sub-component	Interventions/ Key Activities
<p><b>Component 1: Roots of Resilience - Policy, Legal, and Regulatory Framework.</b></p> <p>The objective of this component is to establish the foundation for programmatic and sustained investment and Water Management (SLWM) by enhancing the capabilities of institutions and fortifying natural resource governance structures in Kenya.</p>	

Sub-component	Interventions/ Key Activities
<p><b>Sub-component 1b:</b></p> <p>Development and Implementation of Integrated Watershed and Landscape Restoration Monitoring System.</p>	<p><b>1. <u>Integrated Watershed Monitoring System</u></b></p> <p>1.1 Develop an Integrated Watershed Monitoring Framework. 1.2 Develop and roll-out an Integrated Watershed Monitoring System.</p> <p><b>2. <u>Knowledge Management and Capacity Building</u></b></p> <p>2.1 Strengthen institutional and technical capacity for KEWASIP implementation at national, county and community level. 2.2 Deliver a capacity building programme for watershed data collection and conduct watershed monitoring at the Community, County and National level. 2.3 Train communities on Land Restoration best practices. 2.4 Training of Farmer Field Schools (FFS) Facilitators. 2.5 Establish Knowledge Hubs in Counties and linking with the Maarifa Center. 2.6 Disseminate project and scientific information..</p>
<p><b>Sub-component 1c:</b></p> <p>Sustainable financing mechanisms and investments for watersheds and landscapes management.</p>	<p><b>1. <u>PES Feasibility Assessment and Stakeholder Engagement</u></b></p> <p>1.1 Finalize the Payment for Ecosystem (PES) Framework. 1.2 Undertake feasibility studies to inform the design of PES Schemes for the Chyulu, Mwache and Nyambene Watersheds. 1.3 Develop the PES Governance and Institutional Structures. 1.4 Deliver Institutional Capacity Building and Training on PES concepts. 1.5 Develop a PES Scheme Design. 1.6 Build a business case for Nyambene PES Scheme. 1.7 Institutionalize and provide PES Implementation Support.</p> <p><b>4. <u>Operationalization of PES Scheme</u></b></p>

Sub-component	Interventions/ Key Activities
	<ol style="list-style-type: none"> <li>2. Operationalize two Watershed Payment for Ecosystem Services Schemes.</li> <li>3. Development of a Monitoring, Reporting, and Verification (MRV) system for the established PES Schemes.</li> <li>4. Implement PES Institutional and PES Framework.</li> <li>5. Develop and implement an Incentive and Award Scheme.</li> <li>6. Development of sustainable financing plan to support implementation of integrated restoration management plans for the project site.</li> </ol>

**Component 2: Green Horizons - Sustainable Landscape and Watershed Management.**

This component supports the restoration and management of degraded landscapes through investment and help build resilient livelihoods for the communities in the project area.

<p><b>Sub-component</b> <b>2a:</b> Sustainable Landscape and Watershed Management in Private and Community Lands.</p>	<p><b>1 <u>Implementation of Hydroshed and Micro-catchment Plans</u></b></p> <ol style="list-style-type: none"> <li>1.1 Support the operationalization of County Governance Structures for implementation and monitoring activities at County level.</li> <li>1.2 Undertake a Policy and Capacity Gap Assessment/Opportunities in forestry and landscape restoration at County level</li> <li>1.3 Implement priority SLWM practices in targeted ecosystems/sub-watersheds (County Level)</li> <li>1.4 Implement SLWM initiatives driven by indigenous people beneficiaries</li> </ol> <p><b>2. <u>Livelihood Support Matching Grants</u></b></p> <ol style="list-style-type: none"> <li>2.1 Establish and operationalize community Grant committee</li> <li>2.2 Disbursement of Matching Grants to eligible Community Interest Groups</li> </ol>
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Sub-component	Interventions/ Key Activities
	(CIGs) for the implementation of Micro-catchment Action Plans (MCAPs).
<p><b>Sub-component 2b:</b> Restoration of Gazetted Forests.</p>	<p><b>1 <u>Quality Tree Seeds and Seedlings Production (by KEFRI)</u></b></p> <p>1.1 Enhance collection, testing and distribution of quality Tree Seeds and Seedlings for restoration of degraded landscapes.</p> <p>1.2 Resource Seed Centers within the project sites.</p> <p>1.3 Produce Tree Seedlings (indigenous fruit trees, agroforestry, bamboo and difficult to propagate tree species)</p> <p><b>2 <u>Tree Seedling Production in the Counties (by KFS)</u></b></p> <p>2.1 Refurbish and expand the existing Tree Nurseries in the proposed pilot Counties.</p> <p>2.2 Construct new KFS Tree Nurseries in the proposed pilot Counties.</p> <p>2.3 Construct Mega Regional KFS Tree Nurseries.</p> <p>2.4 Facilitate the production of 250 million Seedlings.</p> <p>2.5 Capacity build communities to Establish Nurseries and enhance Seedling production.</p> <p><b>3 <u>Rehabilitation and Establishment of Demonstration Sites (by KEFRI)</u></b></p> <p>3.1 Rehabilitate degraded watersheds with Bamboo (riverine/riparian areas).</p> <p>3.2 Undertake rehabilitation of degraded natural forest through protection (temporary enclosures) for natural regeneration.</p> <p>3.3 Reseed selected ecosystems including Rangelands and Wetlands within Protected Areas (Marsabit and Nyambene).</p> <p>3.4 Establish Demonstration Sites in the ASAL watershed using Soil and Water</p>

Sub-component	Interventions/ Key Activities
	<p>Conservation technologies.</p> <p>3.5 Establish Rangeland Woodlots.</p> <p>3.6 Facilitate Community Sensitization on Pests and Diseases diagnosis and management options in the projects sites.</p> <p>3.7 Strengthen Landscape-based Vegetation Monitoring in the targeted watersheds.</p> <p>3.8 Facilitate the conservation of threatened Tree Species in the five selected watersheds: 2 areas per project site.</p> <p><b>4. <u>Rehabilitation, Protection and Surveillance of Gazetted Lands (by KFS)</u></b></p> <p>4.1 Strengthen Institutional Capacity of KFS.</p> <p>4.2 Rehabilitate Public Forests and gazetted Water Towers through planting and assisted natural regeneration.</p> <p>4.3 Improve Forest Protection and Surveillance in the proposed public forests and gazetted water towers.</p> <p><b><u>CROSSCUTTING INTERVENTIONS</u></b></p> <p><b>3 <u>Green Corridors and Conservancies</u></b></p> <p>3.1 Restore Habitats for the conservation and protection of biodiversity in Green Corridors and Conservancies.</p> <p>3.2 Establish/Maintain Community and Conservancies Infrastructure.</p> <p><b>4 <u>Agroforestry Value Chains and Market Linkages (SDF)</u></b></p>

Sub-component	Interventions/ Key Activities
	<p>4.1 Identify and verify the mapping of six Agroforestry Value Chains.</p> <p>4.2 Distribute Agroforestry Value Chains to the identified farmers for establishment.</p> <p>4.3 Build and Equip Value Chains Centers.</p> <p>4.4 Establish Innovation and Incubation Centers for selected value chains.</p> <p>4.5 Deliver Value Chain Trainings Programme for the selected value chains in the twelve participating Counties.</p> <p>4.6 Facilitate capacity building programme for agroforestry value chain actors on marketing and trade in Garissa, Isiolo and Samburu Counties.</p> <p><b>5 <u>Agroforestry Woodlots (SDF)</u></b></p> <p>5.1 Deliver a Woodlot Establishment and Management Capacity Building programme for the selected value chains.</p> <p>5.2 Establish and Manage Model Demonstration Plots for the selected value chains.</p> <p><b>6 <u>Invasive Species</u></b></p> <p>6.1 Facilitate the Control and Management of Invasive Species.</p> <p>6.2 Upscale ecosystem specific interventions for control and management of invasive species.</p> <p><b>7 <u>Crosscutting Interventions: Private Public Partnerships (PPP) Investments</u></b></p> <p>7.1 Facilitate ongoing processes on Community conservancies Registration.</p> <p>7.2 Enable and Pilot Public Private Partnerships (PPP) Investment in the five project priority areas.</p>

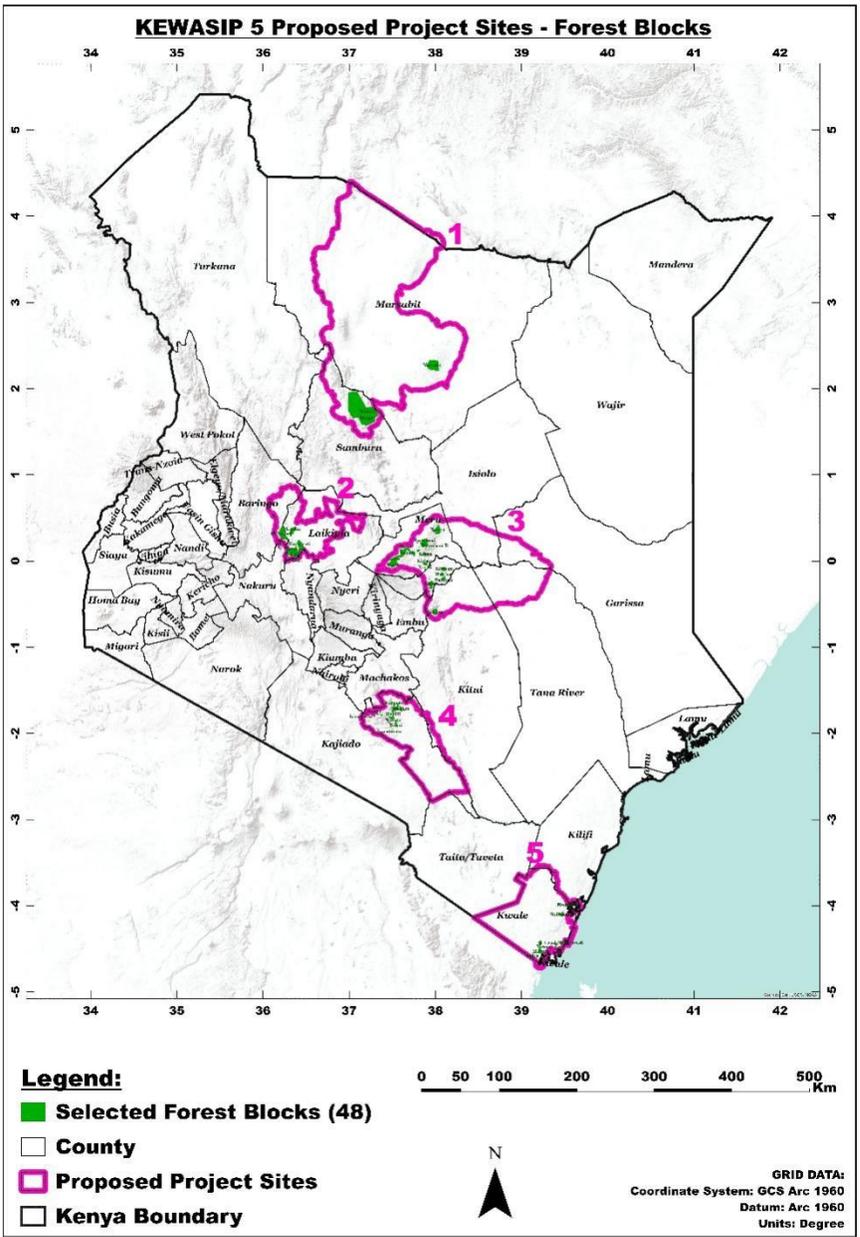
Sub-component	Interventions/ Key Activities
<p><b>Component 3: Project Management, Training &amp; Capacity Building.</b></p> <p>Component 3 aims to ensure the efficient consolidation of planning and budgeting processes, alongside implementation and reporting of project activities in line with the World Bank standards.</p>	
	<p><b>1. <u>Project Management and Coordination.</u></b></p> <p>1.0 <u>Project launch and inception</u></p> <p>1.1 Establish and operationalize NPCU.</p> <p>1.2 Establish and operationalize 12 CPCUs.</p> <p>1.3 Procure and maintain of vehicles (National).</p> <p>1.4 Establish and furnish NPCU office.</p> <p>1.5 Establish and operationalize National Project Steering Committee (NPSC), and NTAC.</p> <p>1.6 Project inception and launch</p> <p><b>1. <u>Training and Capacity Building of Project Staff</u></b></p> <p>2.1 Develop a capacity building plan for NPCU and CPCUs based on the capacity assessment for no –objection of the World Bank and there after implement throughout the project implementation.</p> <p>2.2 Train staff for both the NPCU and CPCUs, covering roles in project management, financial management, procurement, environmental and social safeguards, and monitoring and evaluation.</p> <p><b>1. <u>Financial Management and Procurement</u></b></p> <p>3.1 Develop, review and approve annual work plans and budgets to guide project activities.</p> <p>3.2 Conduct financial audits and compliance assessments.</p>

Sub-component	Interventions/ Key Activities
	<p><b>1. <u>Environmental and Social Risk Management</u></b></p> <p>4.1 Develop and Implement Instruments to ensure adherence to ESF throughout project implementation</p> <p><b>1. <u>Monitoring and Evaluation (M&amp;E) and Reporting</u></b></p> <p>5.1 Develop and Implement M&amp;E System to track progress, outputs, and outcomes.</p> <p>5.2 Conduct regular monitoring visits to project sites.</p> <p>5.3 Prepare Project Statistical Abstract</p> <p><b>1. <u>Knowledge Management</u></b></p> <p>6.1 Develop a centralized project database and repository.</p> <p>6.2 Conduct knowledge-sharing workshops and capacity-building sessions.</p> <p>6.3 Facilitate exchange visits and learning events across counties.</p> <p><b>1. <u>Stakeholder Engagement and Communication</u></b></p> <p>7.1 Develop and implement a communication strategy for continuous stakeholder engagement and communication.</p> <p>7.2 Carry out Risk Mitigation Planning.</p> <p>7.3 Establish Contingency planning</p>

## **1.4 Geographical Targeting**

The Project will use the watershed approach as the unit for integrated planning and management of ecosystems within the project-selected areas. The overarching factors used to identify the project area are the gazetted water towers, the major rivers originating from water towers and the downstream flows of these rivers. To ensure that the project area reflects the potential amount of financing proceeds and effective consolidation of interventions within the watersheds, additional information on land degradation and Sustainable Land and Water Management (SLWM) cost-benefit considerations were used to identify a smaller number of watersheds to ensure the limited resources can generate measurable outcomes. The initial screening to identify focal regions from which to select KEWASIP community watersheds involved a government-led, multi-faceted process where priority was given to catchments experiencing significant land degradation, deforestation, soil erosion, and flood risk, impacting local populations and livelihoods and areas at risk of climate change. These GIS datasets were combined using importance weights to derive a representative score for each potential project site. The selection process was anchored on the importance of water towers as key intervention areas and the desire to intervene across connected catchments with a range of ecosystem types from forests through to agricultural landscapes and rangelands. The five focal regions cover Marsabit, Marmanet, Nyambene, Chyulu Hills, and Shimba Hills (See figure 1).

*Figure 1: Map of the project sites*



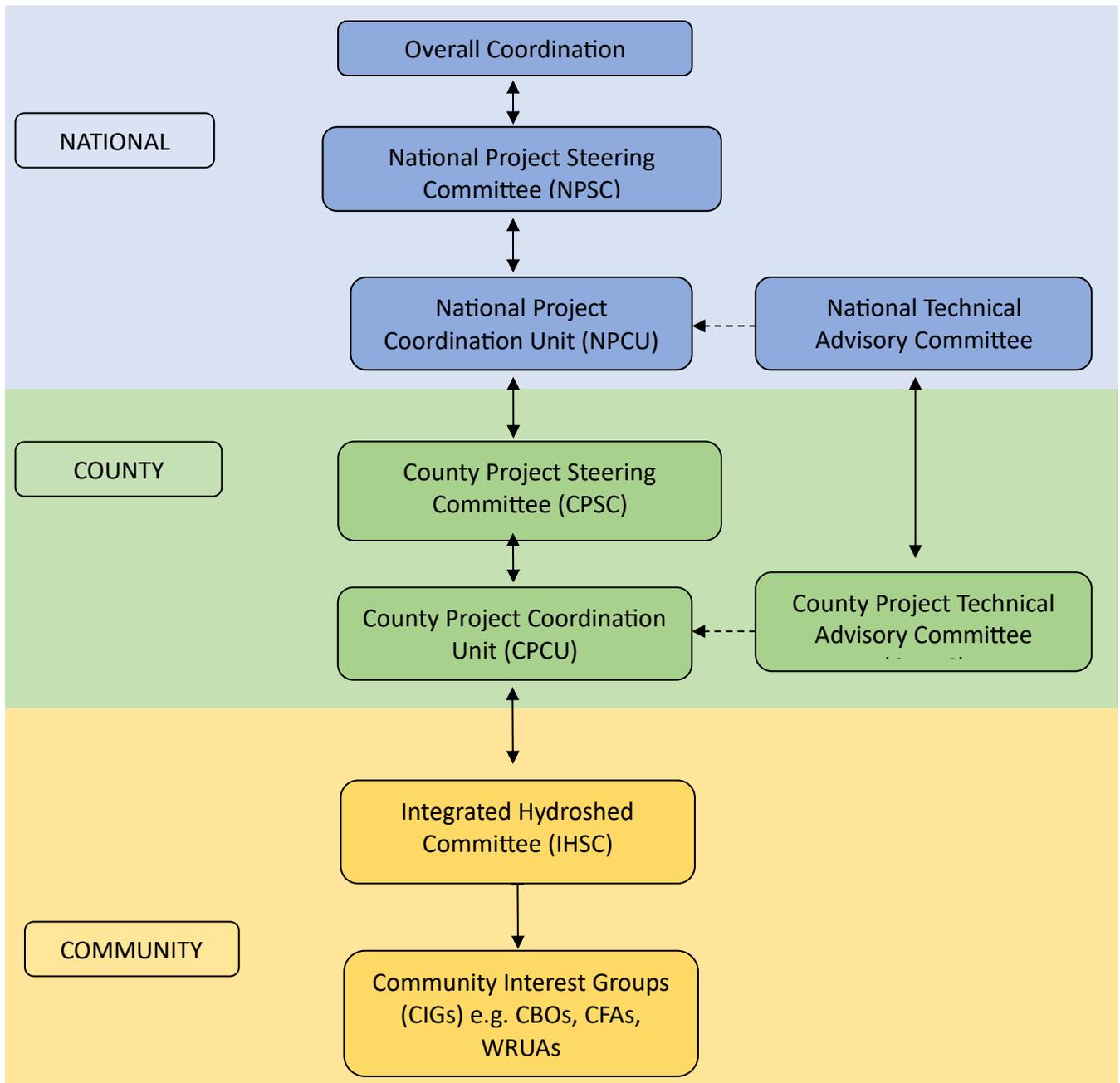
### 1.5 Direct and Indirect Project Beneficiaries

Project beneficiaries will be classified as direct or indirect beneficiaries depending on where they live (i.e., inside or adjacent to project areas) and how they are affected by project interventions and activities (e.g., training, reduced risks, livelihoods, spillover effects, etc.). Beneficiaries will be further classified with the aim of measuring the Project’s gender and Vulnerable Marginalized

Groups (VMG) inclusion results. Benefits will be identified through the participatory preparation of local Community Development Plans (CDPs) under Sub-component 2a.

### 1.6 Institutional and Implementation Arrangements

The KEWASIP will adopt a three-tiered approach representing implementation at national, county, and community levels as shown in the organogram below (Figure 2):



### **1.6.1 NATIONAL LEVEL:**

- i. **National Project Steering Committee (NPSC):** Due to the multisectoral nature of the project, the NPSC, made up of participating ministries, will provide overall project oversight and policy guidance.
- ii. **National Project Technical Advisory Committee (NPTAC):** The NPTAC will be responsible for providing technical support to the overall implementation and operational aspects of the project and ensuring that recommendations from the NPSC are implemented. It will also provide expert advice to ensure environmental, social, and economic objectives are met. The committee will be composed of Technical Experts from the State Departments and their implementing agencies.
- iii. **National Project Coordinating Unit (NPCU):** The NPCU, established under the State Department for Forestry (SDF), in the Ministry of Environment, Climate Change and Forestry (MoECCF) (the lead Implementing Agency), will be responsible for the day-to-day coordination and management of project activities, and implementation of activities at National Level as well as monitoring, reporting and verification of project outputs and outcomes.

### **1.6.2 COUNTY LEVEL (participating counties):**

- i. **County Project Steering Committee (CPSC):** CPSCs will be established in each eligible County Government implementing the KEWASIP and will be responsible for project oversight and quality assurance at the county level.
- ii. **County Project Technical Advisory Committee (CPTAC):** CPTACs will also be established in each eligible County Government implementing the Project to provide technical support to the overall implementation of the project and its operational aspects at the county level, ensuring that recommendations from the CPSC are implemented.
- iii. **County Project Coordination Units (CPCUs):** CPCUs will be established for each county where the Project is being implemented and will be embedded into

the respective county government – in the Environment and Forestry sector department. The CPCU will be responsible of the day-to-day execution of the Project at County Level, and will comprise the County Project Coordinator (CPC) who will be the head of the unit.

### **1.6.3 COMMUNITY LEVEL:**

**Common Interest Groups (CIGs)** including Community-Based Organizations (CBOs) and others, will represent beneficiary communities at the grassroots level and ensure participatory identification, preparation, and implementation of restoration and livelihood sub-projects. These CIGs will prioritize the inclusion of vulnerable and marginalized groups (VMGs) to enhance social and economic participation in targeted rural areas. The project will also link closely with existing entities like local community groups, Community Forest Associations (CFAs), Water Resource Users Associations (WRUAs), Conservancies, and intergraded hydroshed committees ensuring collaborative implementation at the grassroots level.

### **1.7. KEWASIP SEA-SH Rationale**

The initial E&S assessment by the World Bank revealed that social risks are anticipated to be high due to the sensitivity of the targeted project areas with the presence of Marginalized communities (MMGs) who include Vulnerable and Marginalized Groups (VMGs) and Indigenous Persons (IPs) and concerns of social conflict with the potential use of enforcement and compliance officers.

There are potential risks related to sexual exploitation and abuse and sexual harassment (SEA/SH) could be caused or exacerbated by social and intercommunal conflicts emanating from project interventions under Subcomponent 2a and Subcomponent 2b enforcement-related activities, the interaction among project workers and between project workers and communities, as well as the differentiated power dynamics associated with access and distribution of project benefits.

Projects create changes in the communities in which they operate and can cause shifts in power dynamics between community members and within households. Male jealousy, a key driver of GBV, can be triggered by labor influx on a project when workers are believed to be interacting

with community women. Hence, abusive behavior can occur not only between project-related staff and those living in and around the project site, but also within the homes of those affected by the project.

### **1.8 KEWASIP SEA-SH Risk Rating**

The Project's SEA/SH risk rating is assessed as Substantial, taking into account both the direct and potential downstream adverse impacts of Project interventions, the contextual environment in which the Project will be implemented, and the capacity and effectiveness of existing institutional and regulatory systems for prevention, response, and redress in the event of SEA/SH incidents.

Risks of SEA/SH may be caused or exacerbated by social and intercommunal conflicts arising from Project interventions under Component 2a, the enforcement role of the Kenya Forest Service (KFS) in Project activities, frequent interactions between Project workers and communities, and the differentiated power dynamics associated with access to and distribution of Project benefits. To mitigate these risks, the Project has developed a comprehensive SEA/SH Prevention and Response Plan, which will guide the implementation, monitoring, and continuous management of SEA/SH and other forms of GBV throughout the Project lifecycle. The Plan establishes clear prevention, reporting, and response protocols and integrates survivor-centered grievance and referral mechanisms. All Project workers are required to sign Codes of Conduct that include SEA/SH provisions, and all service providers and contractors must demonstrate adequate capacity to enforce and adhere to SEA/SH safeguard measures, which are incorporated into their Terms of Reference (ToRs), Bills of Quantities (BoQs) and contracts.

Further, targeted Environmental and Social (E&S) capacity-building programs at national, county, and community levels include SEA/SH and GBV prevention and response components to enhance awareness, accountability, and institutional responsiveness.

Given the Project's operational context, the multiple interaction points between Project workers and communities, and the underlying gender and social vulnerabilities, the residual SEA/SH risk

remains assessed as Substantial, warranting continuous monitoring, institutional strengthening, and strict enforcement of the established mitigation and response measures.

## **2. SEA-SH in the KEWASIP**

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 on SEA/SH in IPF Involving Major Civil Works defines four key areas of GBV/SEA-SH risks:

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

## **2.1 Kenya's Definition of GBV/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.

## **Contextual Risks**

The risk factors that may contribute to SEA-SH in the project areas include the following:

- (a) restrictions on land use or access to land and natural resources;
- (b) social conflicts or exacerbation of existing conflicts resulting from challenges in establishing equitable benefit-sharing mechanisms for investments on community land as well as access to grants;
- (c) physical and economic displacement of communities with impacts on both their economic status and social cohesion;
- (d) adverse impacts on livelihoods from failed or unsuitable livelihood restoration activities;
- (e) exclusion from project benefits, especially for MCs and other vulnerable target populations;
- (f) gaps in stakeholder engagement, information disclosure, and grievance redress, particularly on free, prior, and informed consent (FPIC) for MMGs emanating from capacity implementation gaps;
- (g) child labor, particularly in initiatives requiring communal labor.
- (h) Poor access to water, sanitation and energy (fuel wood) exposing women and girls to SEA-SH;
- (i) Invasive alien plant species in ASAL counties (*Prosopis juliflora*) posing insecurity issues that exacerbate GBV;
- (j) Seasonal migration of pastoralists in search of water and pasture.

### **3. Policy, Legal and Regulatory Frameworks**

#### **A. Policy Framework**

***The National Policy for the Prevention and Response to Gender Based Violence - 2014***, provides 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 is tailored for all County Governments and aims at ensuring that every county government can

address SEA-SH issues that they face. It provides the framework for counties to recognize SEA-SH as a human rights violation and to provide resources to curb it in the respective counties. *Kenya Social Protection Policy (2023)*. It provides a policy framework that addresses the country's evolving and growing Social Protection needs.

## **B. Legal Framework**

***The Constitution of Kenya.*** 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. Therefore, any illegal aggression on the person that compromises human dignity is unconstitutional. Hence SEA-SH is not only illegal, but also a human rights violation and unconstitutional in Kenya.

*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 Constitution has an elaborate set of protective remedies for all forms of violence, including SEA-SH.

***The Sexual Offences Act (Cap 62A Laws of Kenya)***. This Act of Parliament is aimed at protecting from the harm of unlawful sexual acts. Section 5 of the Act incriminates sexual assault with a possibility of imprisonment for life upon conviction.

*Section 6*, read together with section 43, addresses intentional and unlawful acts and includes instances where people in authority may use their authority so as the other party is unable to show resistance or unwillingness to such illegal sexual advances. This makes sexual abuse and exploitation a crime in Kenya.

*Section 23(1)* of the Act makes sexual harassment an offence punishable under the law for a term not less than 3 years or a fine of not less than Kenya Shillings One Hundred Thousand (KShs.100,000) or both.

***The Employment Act (Cap 226 Laws of Kenya)***. This Act of Parliament regulates 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 who has twenty or more employees to have a policy statement on sexual harassment and ensure that every employee knows about it. In the project under preparation the need for a code of conduct for the contractor and for employees cannot be negated.

***Occupational safety and Health Act (Cap 514 Laws of Kenya)***. The act mandates employers to ensure safety and health and welfare for all workers at work which includes protecting employees from SEA-SH.

***The Penal Code, Cap 63 Laws of Kenya***. The Penal Code does not specifically address GBV offences. However, section 250 and 251 of the code on assault and assault causing actual bodily harm respectively, may be invoked against any person who assaults another one regardless of gender.

***Children's Act No. 2 of 2022***. Designed to safeguard the rights and welfare of children.

***The Persons with Disabilities Act***, 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.

***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 gender-based violence, to provide for the protection, treatment, counselling, support, and care of victims of SEA-SH, and for connected purposes.

### **C. Institutional Framework**

A number of key institutions are involved in management of SEA-SH and these include:

- i. Ministry responsible for Gender that provides overall leadership and coordination in policy implementation;
- ii. National Gender and Equality Commission provides oversight on the implementation of GBV policies by state and non-state actors;
- iii. Ministry of Health delivers SEA-SH health related services at national and county levels;
- iv. Ministry of Interior and National Government Coordination which offers security, investigation and arrest of potential and actual perpetrators of SEA-SH;

- v. The Attorney General's Office administers justice for SEA-SH survivors;
- vi. Directorate of Public Prosecutions undertakes investigation and prosecution of SEA-SH cases;
- vii. Judiciary -courts deals with GBV crimes;
- viii. Commission on Administration of Justice (CAJ)/ombudsman
- ix. Ministry of Labour ensures that employers and employees adhere to legal provisions on SEA-SH;
- x. Public Service Commission develops code of conduct for public service officers to follow that includes SEA-SH;
- xi. County Governments establish facilities and infrastructure necessary for SEA-SH responses at the County level.
- xii. Directorate of Occupational Safety and Health which ensures safe and healthy workplaces.

#### **D. International and Regional Treaties and Conventions**

##### **The Convention on the Elimination of All Forms of Discriminations Against Women (CEDAW)**

Kenya ratified this treaty in 1984. The treaty seeks to realize equality between men and women by ensuring that there is no discrimination against women in all spheres of life. This means that women should compete for the same positions with men whenever employment opportunities arise. Any discrimination will therefore constitute SEA-SH against women.

Article I of the Convention defines "discrimination against women" to mean "any distinction, exclusion or restriction made based on sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of equality of men and women, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field."

##### ***The African Charter on Human and Peoples' Rights (Banjul Charter)***

Article 5 of the charter guarantees every individual the right to dignity which includes the protection from all forms of exploitation and human degradation. SEA-SH manifests different forms of inhuman treatment to victims and in many cases is a form of exploitation.

***Protocol to the African Charter on Human and Peoples' Rights on the Rights of Women in Africa (Maputo Protocol)***

Article 3 of the protocol seeks to eliminate all forms of discrimination against women and require States Parties to pass necessary legislation to ensure equality between women and men.

Article 4 of the protocol guarantees every woman dignity and requires States Parties to adopt appropriate measures to prohibit any exploitation or degradation against women.

Other treaties and conventions include but not limited to:

- i. Universal Declaration of Human Rights (UDHR, 1948),
- ii. The International Covenant on Civil and Political Rights (ICCPR, 1976),
- iii. The Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (1984),
- iv. The United Nations Convention on the Rights of Child (CRC, 1989),
- v. UN Resolution 1325 (2000),
- vi. The UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (2000),
- vii. The ILO Convention 182 on the Worst Forms of Child Labor; and
- viii. The Optional Protocol to the Convention of the Rights of the Child.

Overall, Kenya has the requisite policy, legal and institutional framework to prevent and curb SEA-SH. However, the vice of SEA-SH has not been eradicated. Every effort at preventing and curbing the vice is a work in progress in every sector of society. The project aims to prevent and respond to SEA-SH complaints and incidences in an effort to ensure that the project does no harm to the beneficiaries and workers.

#### **4. Screening for potential SEA-SH Risks in KEWASIP Project sites**

Project activities have the potential to impact on the gender roles and power structures that exist in communities, with women, girls, and boys are at risk of sexual harassment, exploitation, or abuse. Project activities that pose potential negative SEA-SH risks and impacts that include investments support for VMGs, job opportunities, community empowerment during trainings, and landscape restoration activities. The KEWASIP shall implement mitigation and management measures to reduce the SEA-SH risks that could arise at project sites during implementation. Women and girls are more susceptible to SEA-SH risks as compared to men and boys. Other circumstances that could increase vulnerability to SEA-SH risks include disability, age, socio-economic status and marginalization. The factors that contribute to vulnerability of SEA-SH in the project areas include:

- i. *Power asymmetry*. Potential abuse of power and sexual exploitation in labour practices such as hiring and employment practices that seek to increase the number of women in labour-intensive work schemes for instance construction of terraces, gabions, tree planting, removal of invasive species among others can expose women to incidents of sexual exploitation, harassment, or violence. Additionally, unequal gender norms and harmful beliefs about the roles of women inside and outside the home run the risk of creating hostile environments for female workers. In cases where female workers have less time for traditional gender-related work such as childcare, this can also lead to a potential increase in Intimate Partner Violence (IPV).
- ii. *Poverty and Inequality*. Widespread inequity and poverty usually result in desperation, which puts some women and girls at risk for SEA-SH when they engage with the project employees who receive benefits. The 12 project counties average poverty levels vary, but there are pockets of extreme poverty in every one of them, increasing their vulnerability to SEA-SH.
- iii. *Societal norms*. Women and girls are at usually high risk of SEA-SH because of *societal norms* that perpetuate power differentials between males and females, and support or condone males' violence against women and girls. Labor influx poses an additional risk, and the extent to which a community has capacity to absorb labor influx, as well

as the inflow of income to workers, can exacerbate already existing inequities between workers and community members.

- iv. *Low levels of education and literacy.* Mostly among girls, that leads to high unemployment rates among women. These factors weaken women's and girls' confidence as they seek menial jobs in construction sites and means they are at risk of SEA-SH from workers who often have higher incomes than usually available to community members.
- v. Workplaces that are rigidly hierarchical, giving management enormous and/or unwarranted power, with limited support to female leadership is at risk for sexual harassment.
- vi. Ineffective GRM and lack of awareness on the forms of SEA-SH, reporting channels among communities in project areas. The project will ensure that communities are sensitized appropriately on the different forms of SEA-SH, and reporting channels. This will enable effective reporting and follow-up of cases including rape and sexual assault, physical and mental abuse, inappropriate touching, aggressive language, and derogatory or culturally insensitive language among other forms of sexual harassment in the community that could result from the initiatives.

Some of the forms of SEA-SH committed by project workers against women and girls in the community that could arise from the project include rape and sexual assault, physical and emotional abuse. Sexual harassment may include inappropriate touching, use of abusive, and demeaning or culturally inappropriate language. Sexual exploitation will likely include transaction sex and other forms of humiliating, degrading or exploitative behavior.

Other risk factors for SEA-SH include female laborers working alongside male laborers without adequate supervision, without separate washrooms for males and females, forested areas and in areas that are not well lit.

## **5. SEA-SH Prevention and Response Plan for the KEWASIP**

This plan outlines critical operational procedures and protocols that will be deployed to prevent, mitigate and respond to all forms of (GBV/SEA-SH) 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 KEWASIP project workers.

Necessary mechanisms will be put in place by KEWASIP 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:

### **5.1 Staffing**

The management of Sexual Exploitation, Abuse, and Sexual Harassment (SEA/SH) risks requires specialized expertise, sustained coordination, and continuous capacity building at national, county and community levels. There will be dedicated Environmental and Social (E&S) officers at the NPCU and CPCUs. While the Project has already established functional E&S systems to manage a broad range of social risks, the magnitude and complexity of the social dimensions under KEWASIP combined with its high social risk rating necessitate additional specialized technical support.

To ensure robust and consistent implementation, the Project will engage a dedicated SEA/SH Specialist on an as-needed basis, with an initial full-time engagement for six to twelve (6–12) months. This initial period will allow the Specialist to establish and strengthen the necessary systems, tools, and capacities for effective SEA/SH prevention and response. Thereafter, the Specialist will be retained on an intermittent or on-call basis to provide technical backstopping, refresher training, and quality assurance support as needed.

During the initial engagement, the Specialist will work closely with the social safeguards officers to refine and operationalize the SEA/SH Prevention and Response Plan; design and implement training and sensitization programs for Project staff, contractors, and community stakeholders; identify, vet, and onboard qualified SEA/SH service providers; establish and train SEA/SH focal

points at national, county, and community levels; integrate SEA/SH risk management procedures within the Project’s procurement and supervision systems; and develop practical guidelines to ensure the sustainability of SEA/SH prevention and response efforts.

**5.2 Monitoring, Evaluation, and Learning**

To implement this SEA/SH Prevention and Response Plan, a structured Monitoring and Evaluation (M&E) Framework has been established to track progress, measure effectiveness, and ensure accountability in the prevention and response to SEA/SH. The framework will also document and track all reported cases, including their status (ongoing or closed). Continuous training of project staff and sensitization of communities will be integral to the successful implementation of the Plan.

The M&E Framework will use measurable indicators to monitor implementation and outcomes of SEA/SH risk management activities. Key indicators and corresponding targets will include:

Indicator	Target / Milestone	Responsible Entity
SEA/SH Specialist recruited and onboarded	Within 3 months of Project effectiveness	NPCU / State Department of Forestry
SEA/SH focal points identified and trained	At least 1 per implementing agency and county by Month 6	NPCU / County PIUs
Mapping and vetting of SEA/SH service providers	Completed in all target counties by Month 6	SEA/SH Specialist / Social Officer
SEA/SH referral pathways established and disseminated	Functional in all project counties by Month 9	NPCU / County PIUs / Service Providers

Codes of Conduct signed by Project workers and contractors	100% prior to mobilization	Contractors / Implementing Entities
SEA/SH grievance entry points established and functional	Within 3 months of Project effectiveness	NPCU / GRM Focal Points
Sensitization and awareness sessions conducted	At least two campaigns per year per county	NPCU / County PIUs
SEA/SH incident reporting and case management	100% of cases addressed per protocol within 24 hours	SEA/SH Focal Points / Service Providers
Annual review of SEA/SH implementation	Conducted annually and documented	NPCU / MoECCF / World Bank

### 5.3 SEA-SH Code of Conduct

A Code of Conduct (CoC), is 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, suppliers, 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 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 included in **Annex 2**. The CoC contains protocols for confidentiality and information sharing.

Treatment and Counselling Procedures in use for SEA-SH 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, Grievance Mechanism (GM) or citizen engagement/feedback mechanism that will be provided.

**Mapping SEA-SH Service Providers:** 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 3**.

**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 KEWASIP'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/MoG/NSC KEWASIP is in place to promote and monitor social safeguards, including SEA-SH 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 of Forestry has an organizational accountability to work closely with implementing partners to manage shared risks and address common challenges.

**Awareness creation:** Awareness creation will be undertaken to project workers, project beneficiaries and the communities through meetings/barazas/posters/local radio/television stations and social media platforms sensitize the communities on SEA-SH.

**Training and capacity building:** develop and deliver continual training to project workers and communities 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 SEA-SH GM embedded in the Project GRM will enable reporting in a safe, confidential survivor-centric manner. The project SEA-SH Grievance Mechanism will ensure all incidents of SEA-SH reported are relayed to the NPCU and World Bank within 24 hours. The Social Officer at the NPCU and CPCUs will support SEA-SH risk management. Also, the GBV consultant (engaged on need basis) and GBV/SEA-SH service providers will be engaged on GBV/SEA-SH case management.

#### **5.4 SEA-SH Grievance Redress Mechanism (GRM)**

KEWASIP will establish a Grievance Redress Mechanism (GRM) with multiple accessible channels to facilitate the safe, confidential, and ethical reporting of SEA/SH complaints across all project locations. The GRM will explicitly integrate SEA/SH entry points with clear procedures, tools, and protocols to ensure that complaints are managed appropriately and confidentially. Specific measures for project workers will be included to address workplace-related SEA/SH concerns.

As part of the GRM design, consultations will be conducted with affected communities—particularly indigenous and marginalized groups, women, girls, and persons living with disabilities—to identify preferred complaint channels (e.g., in-person, phone, online). The process will prioritize confidentiality, anonymity, and survivor-centered approaches. Lessons learned from other projects will be incorporated to strengthen accountability to communities. Periodic team meetings will be held to review grievances, discuss workplace concerns, and ensure that all issues are appropriately tracked and addressed.

Dedicated SEA/SH entry points will be clearly specified within the GRM to provide alternative reporting channels for cases that require heightened confidentiality or specialized handling, ensuring that all complaints receive timely and appropriate attention.

In developing the project GM to facilitate resolution of SEA-SH complaints, the KEWASIP will be guided the by the following principles:

- i. *Confidentiality:* At all stages of the intervention, the privacy and confidentiality of survivors will be assured, prioritizing the well-being of survivors and that the delivery of services and support will not compromise the privacy or identity of individuals involved.
- ii. *Respect:* Respect of the wishes, dignity and choices of the survivors will be observed at all times and during all stages of any intervention. Survivors will be supported to give their free and informed consent, based on a clear understanding of the facts, implications, risks, and consequences of an action, before information is shared or action is taken.

- iii. *Safety and security:* Awareness and consideration of any risks or safety concerns that might compromise the physical safety of individuals affected by SEA-SH will be sufficiently addressed and factored into any SEA-SH intervention or initiative.
- iv. *Non-discrimination:* All SEA interventions will be designed to ensure access and the same level of quality of care and assistance for all persons seeking support, or persons affected by SEA, without regard to sex, sexual orientation, gender identity, age, ethnicity, religion, or other status.

The project GM will implement a survivor-centered approach to managing SEA-SH complaints including the use of SEA-SH victims' referral centers (Annex 3). The focus of GM would be confidentiality to protect the privacy and choices of the victim, and urgency to preserve evidence and access assistance and care for the victim. For these reasons the complaint is not expected to follow a uniform pattern. The complainant will be free to use any avenue to report including text message, email, phone call, text, or in-person to a trusted colleague, member of a Grievance Redress Committee (GRC), SEA-SH service provider, local CBO or NGO. If the complaint is received by any other person or entity other than the designated SEA-SH services provider, the case should be referred as soon as possible for their action.

## **5.5 SEA/SH Resolution and Management Committee**

The Project will establish a SEA/SH Resolution/Management Committee to oversee the management, resolution, and monitoring of SEA/SH complaints to ensure effective, survivor-centered, and accountable handling of cases.

Composition:

- i. Representatives from the National Project Coordination Unit (NPCU) and County Project Coordination Units (CPCUs)
- ii. SEA/SH Focal Points at national, county, and community levels
- iii. Project Environmental & Social officers
- iv. Representatives from relevant contracted SEA/SH service providers

- v. Community representatives, including women, youth, and marginalized groups where appropriate

#### Roles and Responsibilities:

- i. Oversee the SEA/SH grievance management and resolution process in line with the project GRM
- ii. Coordinate with SEA/SH Focal Points, service providers, and project management to ensure timely and ethical handling of complaints
- iii. Monitor and review reported cases to ensure appropriate follow-up and survivor support
- iv. Ensure confidentiality, ethical handling, and proper documentation of all cases
- v. Evaluate the effectiveness of referral pathways and support services
- vi. Provide periodic reports and recommendations to project management on SEA/SH risk mitigation and prevention

The committee will have a clearly defined mandate regarding case management, referral decisions, and interaction with project staff and contractors. The Committee will meet quarterly and on an ad hoc basis in case of reported incidents.

## **5.6 Referral Pathway and Timelines**

Mapping of SEA/SH service providers and establishment of referral pathways will be completed within six (6) months of Project effectiveness in all participating counties. The mapping exercise will include:

- i. Identification of available services: Health, psychosocial, legal, protection, and other relevant support services for survivors and persons at risk of SEA/SH.
- ii. Vetting and verification: Verification of service provider credentials, contact details, referral procedures, service hours, and capacity to provide timely, confidential, and survivor-centered support.
- iii. Designation and formal engagement: Service providers will be formally designated through agreements or memoranda of understanding, specifying roles, responsibilities, and reporting lines within the project referral system. SEA/SH service providers do not possess sanctioning or disciplinary authority over KEWASIP project workers, contractors,

or implementing agency staff. Their mandate is limited to providing clinical, psychosocial, legal, and case management support, and advising project management on appropriate follow-up actions in line with survivor-centered principles. Disciplinary, administrative, and contractual sanctions are executed solely by project coordination structures (NPCU/CPCUs), contractor management, and law enforcement authorities, as appropriate. Service providers interact with project management and contractors through the established SEA/SH referral and reporting protocols, which include: Timely notification to SEA/SH Focal Points (with survivor consent); Provision of relevant case information required for administrative or contractual action; Coordination with project management during case follow-up; and Referral to police or legal institutions where required by law. Service providers themselves may be sanctioned by the Project in cases of contractual breach, negligence, mishandling of confidential information, or failure to adhere to professional or survivor-centered standards. Applicable sanctions may include written warnings, suspension, contract termination, removal from the referral directory, or other measures stipulated in their contractual agreements.

- iv. Development and dissemination of referral directories: County-specific referral directories will be prepared and shared with SEA/SH focal points, project staff, contractors, and communities.
- v. Integration into project materials: Referral pathways will be integrated into community sensitization programs, awareness campaigns, and GRM communication materials to ensure accessibility and visibility.
- vi. Funding arrangements: Operational costs for service providers, including personnel, transport, and other service delivery expenses, is be budgeted for under SEA/SH component to ensure uninterrupted service provision.

Periodic updates to the referral directories will be undertaken annually to maintain accuracy, relevance, and accessibility of services across all project locations.

## **5.7 SEA-SH Reporting Process**

The process of handling a SEA-SH complaint will include; (i) The person that receives the complaint/report will inform KEWASIP national PCU (NPCU) immediately; (ii) The NPCU will facilitate for any required emergency support and care in coordination with the designated SEA-SH service provider and simultaneously refers the case to the service provider; and, the NPCU shall inform the World Bank of the SEA-SH incident within 48hours.

Due to the sensitivity of SEA-SH incidents, the only information to be obtained from the complainant will be:

- i. demographic data, such as age, gender and name(optional);
- ii. the nature of the complaint (what the complainant says in her/his own words);
- iii. whether the complainant believes the perpetrator was related to the project; and
- iv. Whether they received or were offered referral services.

The SEA-SH service provider will review the case and decide on the appropriate actions to be taken and sanctions, if any. The SEA-SH service provider will undertake the following actions, as needed;

- i. Refer the case to the police as appropriate and according to the law
- ii. Assign the appropriate focal person to implement the actions with the assistance of the SEA-SH expert or Services Provider, in accordance with their employment contract and the appropriate code of conduct, if applicable.
- iii. Upon resolution, the Focal person with guidance from the SEA-SH Services Provider will advise the survivor on the implemented actions.
- iv. The GM focal person will record the resolution on the project grievance mechanism database and close the case.



**Table 2: SEA-SH PREVENTION AND RESPONSE PLAN**

<b>S/N</b>	<b>OBJECTIVES</b>	<b>Steps to be taken/activities to address SEA-SH risks</b>	<b>Timelines</b>	<b>Responsible</b>	<b>Monitoring (who will go to monitor)</b>	<b>Output indicators</b>	<b>Time Period (days)</b>	<b>Estimated Budget (KES)</b>
1.	A SEA-SH project-level structure is established with the Principal Secretary (PS), SDF and KEWASIP National Project Coordinator (NPC) supported at senior management and technical-	PS, SDF officially designates SEA-SH Focal Persons at national project level and the County secretary appoints the SEA-SH focal persons at the county level.  Appoint a SEA-SH resolution Committee at national and county levels	Start at inception phase  Throughout the project cycle	Principal Secretary, County Secretary, National Project Coordinator, Social Officers/GBV SEA-SH focal Points.	National Project Coordinator, PCU Social Officer/GBV SEA-SH focal points	SEA-SH focal persons appointed and trained.  A functional SEA-SH committee operational at the National, County	Within the first 30 days after effectiveness of the projects	10,000,000

	<p>levels to lead, oversee, and deliver on SEA/SH prevention and response plan.</p>	<p>Train the project management team at national and county levels on SEA-SH.</p> <p>Mobilize Project Implementing Partners through their E&amp;S Focal Points to be in the lead in SEA-SH management for the components they support.</p> <p>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.</p>				<p>No. of Partnerships established.</p> <p>SEA-SH policy/guidelines/manuals endorsed and publicized</p> <p>No. of SEAH-SH trainings/awareness creation meetings conducted for SEAH SH management committee</p>	<p>6 months (3-5 day) trainings on SEA-SH GBV issues at any given time</p>	
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		Develop terms of references and operational guidelines that will guide the SEA-SH management committee				% of cases/issues reported and resolved		
						Operational guidelines developed		
<b>2</b>								
	Map out all communities where the subprojects are to be implemented for and establish a referral pathway	Conduct field visits and or remote(desk) review to identify and map the existing services, gap analysis, entry points for survivor assistance, and local actors working on the prevention of and/or	Within the first 6 months after disbursement and NOT later than 9 months after	Social officers and E&S Focal Points, County/Sub-county Social Officers and Children Officers, Gender Officers.	Social officers /GBV SEA-SH at National and county level	The Mapping Report Service provision/pr oviders capacity assessment report	5 days per county	7,000,000

	<p>of services for survivors of SEA-SH.</p> <p>Undertake social cultural environmental mapping to identify stakeholders/GB V actors for response mechanism in relation to SEA-SH contexts.</p>	<p>Response to gender-based violence and a reporting process as annexed in Annex 3 to be customized for the 12 different counties.</p> <p>Towards achieving this the following will be undertaken:</p> <ul style="list-style-type: none"> <li>o Conduct a desk review of SEA-SH service providers in hosting Counties and communities.</li> <li>Including the prevention and response mechanism</li> <li>o Field visits</li> </ul>	<p>disbursement</p> <p>Prior to Implementation of any sub-projects</p>					
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	Mapping of existing Service providers will be undertaken and those mapped will include CBOs, NGOs, and other civil society organizations.	<p>o Stakeholder consultations</p> <p>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.</p> <p>Sample service providers as Identified during stakeholder consultation and of the SEA-SH Plan.</p>						
3	SEA/SH/GBV Support and Service Providers	Funding to hire specialized experts (e.g., GBV Advisor) and cover operational costs of SEA/SH service providers, including	continuous	NPCU,CPCUs				10,800,000

		protection, psychosocial support, emergency medical care, referral services, and training/sensitization activities						
		Hire of GBV/SEA-SH Advisor	Within the first three (3) months of Project effectiveness; full-time engagement for 6–12 months, thereafter on-call as needed.	National Project Coordination Unit (NPCU) / State Department of Forestry				10,000,000
<b>4</b>								

	<p>Enhance the capacity of community, local leadership and project workers to effectively prevent and respond to SEA/SH.</p>	<p>Capacity assessment of the implementing agencies, partners before embarking on the trainings so as to understand the gaps and be able to monitor/measure progress from the trainings undertaken over the project duration.</p> <p>Provide detailed and comprehensive awareness to beneficiaries and local leaders, induction to project participants and training to project</p>	<p>Within the first 6 months and before the implementation of any subproject.</p>	<p>E&amp;S Focal Points, GBV SEA-SH, County/Sub-county Social Safeguards Officers and Children Officers, Gender Officers.</p>	<p>Social officers NPCU</p>	<p>No. of Protocols and operational procedure</p> <p>Number of training sessions</p>	<p>Continuous</p>	<p>5,000,000</p>
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		workers on SEA/SH procedures and protocols.  Offer training for CIGs, traditional and faith leaders, media, and other stakeholders on innovative approaches for prevention of, and response to SEA/SH. Prepare project SEA/SH code of conduct.						
5								
	This is aimed at creating an understanding of the magnitude and effects of SEA-SH and what	Structure and roll out a marketing and communication Strategy/campaign to educate and raise awareness about SEA-SH.	Within the first 6 months after disbursement and before any	Social Specialist and E&S focal points, county, sub-county social development	NPCU and County Coordinators, SSDS to get reports	Communication strategy and Stakeholder Mapping Report	Continuous	2,000,000

	<p>can be done to prevent such scenarios during and after the project.</p> <p>The step is aimed at prevention and early detection of any practices that may lead to SEA-SH Helps to eliminate, or address any social, political, cultural tradition and religious factor that gives lee ways to SEAH.</p>	<p>This includes appropriate signage at project sites.</p> <p>The development of the communication strategy should involve stakeholders at all and the communities where the project is implemented for referral services for survivors of SEA-SH.</p> <p>Mobilize institutions and government bodies to be in the lead of transforming culture and behavior</p>	<p>calls for bids or initiation of activities in the respective county</p> <p>Throughout the project Implementation.</p> <p>Throughout the implementation of project Continuous throughout</p>	<p>officers and children, Gender officers</p>		<p>Number of awareness campaigns/sessions and community discussions held per sub-project location</p> <p>Periodic community engagement reports focusing on awareness creation on SEAH prevention</p>		
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		<p>which cause discrimination against women and girls in that community.</p> <p>Involve women, men and young boys in developing initiatives that will bring sustainable solution for SEA-SH through continuous awareness.</p> <p>Create an environment for girls and women to engage in project create forums for women and girls to safely voice</p>	<p>project cycle</p> <p>In the first 6 months and throughout the project cycle</p>			<p>Project locations with separate facilities for women and men and appropriate GBV-free zone signage.</p>		
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		<p>their concerns, needs and feedback? Theses may also be integrated as an inclusive and SEA-SH sensitive feature of the GM development activities.</p> <p>Ensure that SEA-SH requirements are included in bid documents including the requirement for a Code of Conduct.</p> <p>Ensure that the project locations contain separate facilities for women and men</p>						
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6	<p>To ensure that every /survivor is facilitated to access immediate, quality assistance (medical care, psychosocial support, legal assistance, reintegration support.</p>	<ul style="list-style-type: none"> <li>i. Identify community-based safe shelters with the right personnel and outreach services for the protection of survivors of SEA/SH.</li> <li>ii. Develop a SEA/SH referral pathway.</li> <li>iii. Facilitate survivors to access quality GBV service providers in line with their wishes.</li> </ul>	<p>Across the project cycle</p>	<p>Project Social Officers, SEA-SH management Team</p>	<p>National Project Coordinator</p>	<p>Communities well informed of survivors, survivors.</p> <p>A functional referral pathway community and project workers.</p>	<p>3,000,000</p>
7							

Survivors of SEA/SH easily reach out and report violence against them and promptly receive supportive response.	<p>Sensitize community and project workers on channels of reporting cases of SEA/SH in the GM.</p> <p>Create awareness on disciplinary actions against anyone that breaches the Code of Conduct.</p> <p>Regularly update the information sharing protocol to enhance who is receiving information and how best it is used.</p> <p>Update disclosure and reporting guidelines / protocol for SEA/SH</p>	<p>Throughout the project life</p> <p>At project preparation phase and mid-term</p> <p>Quarterly</p>	<p>Social Specialists and GM Officer</p> <p>E&amp;S Focal Points</p> <p>County/Sub-county Social Officers and Children Officers, Gender Officers</p> <p>National Project Coordinator</p> <p>Social Specialists and GM Officer</p>	<p>National Project Coordinator</p> <p>NPCU and County Coordinators</p> <p>National Project coordinator</p>	<p>A SEA-SH response GM</p> <p>Number and Nature of guidelines and procedures</p> <p>Number of SEA-SH cases document</p> <p>Number of referrals of SEA/SH in providers.</p> <p>% of SEA/SH</p>		
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		<p>with a provision for survivor protection and assistance.</p> <p>Review logs for SEA/SH documentation to ensure it follows standards for documenting SEA/SH cases.</p> <p>Identify and review culturally appropriate community-based reporting mechanism to facilitate reporting.</p>		<p>E&amp;S Focal Points</p> <p>National Project Coordinator</p> <p>Social Officers and GM Officer</p> <p>E&amp;S Focal Points</p>		<p>complaints not resolve.</p> <p>Number of cases closed.</p>		
	To measure how well this Action Plan is	Develop indicators to assess project implementation.	Quarterly and annually	National Project Coordinator	SEA-SH Management Structure	Number of issues		3,500,000

	<p>being implemented, identify and address any issues that might emerge, to improve outcomes.</p>	<p>Develop a reporting template for documenting cases of SEA/SH categorized in various forms.</p> <p>Quarterly and annual reporting to measure effectiveness of the various support systems to respond to SEA/SH.</p> <p>Conduct mid-term and end-term SEA/SH risk assessment.</p>		<p>Social Specialists GM Officer E&amp;S Focal Points</p>		<p>reported on SEA-SH Shift in attitude of project workers</p> <p>Quarterly and annual reports.</p> <p>Mid- and end-term SEA/SH risks</p>		
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**Conclusion**

This Plan details the operational measures that will be put in place to prevent and respond to project related GBV-SEA/SH including managing related grievances. KEWASIP will allocate resources (human and financial) and engage a GBV-SEA/SH advisor to support the implementation the SEA/SH action plan. The estimated budget is **KES 51,500,000.**

## 6. Annexes

### Annex 1: Code of Conduct for Project Workers

#### Kenya Watershed Services Improvement Project (KEWASIP)

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

##### 1. Introduction

This Code of Conduct sets out the standards of behavior required of all project workers under KEWASIP. It provides:

- i. **Core Values** – the ethical foundation that guides worker behavior.
- ii. **Compliance Guidelines** – practical standards aligned with Kenyan law and project policy.

All workers are expected to uphold professionalism, integrity, and accountability while on duty.

##### 2. Core Values

The following nine values form the foundation of KEWASIP's Code of Conduct:

- i. Safety – Plan and carry out work safely, protect colleagues and the public.
- ii. Honesty – Be truthful and transparent in all communications.
- iii. Integrity – Do what is right and reject what is wrong.
- iv. Fairness – Treat others impartially, without discrimination.
- v. Accountability – Take responsibility for your own actions and decisions.
- vi. Consideration of Others – Respect dignity, rights, and opinions of others.
- vii. Pursuit of Excellence – Commit to quality work and continuous learning.
- viii. Reliability – Keep commitments and respond promptly.
- ix. Citizenship – Comply with laws, protect the environment, and contribute positively to communities.

##### 3. Equal Employment Opportunity and Employment Laws

KEWASIP and its contractors will:

- i. Comply with national employment and equal opportunity laws.

- ii. Make decisions without discrimination based on race, gender, age, religion, disability, or other protected characteristics.
- iii. Provide reasonable accommodation for persons with disabilities in line with Kenyan law.
- iv. Ensure a workplace free from harassment, intimidation, and retaliation.

#### **4. Gender-Based Violence (GBV), Sexual Exploitation, Abuse & Sexual Harassment (SH), and Child Abuse/Exploitation (CAE)**

KEWASIP adopts a zero-tolerance policy on GBV, SEA/SH and CAE. All workers must:

- i. Refrain from any form of sexual exploitation, abuse, or harassment.
- ii. Report suspected or actual cases of GBV/SH/CAE immediately through the project grievance system.
- iii. Promote a safe, respectful, and inclusive workplace.

#### **Reporting Responsibilities and Sanctions:**

- i. All workers, supervisors, and management are required to report suspected or actual cases.
- ii. Failure to report will result in disciplinary action, up to and including suspension or termination, depending on severity.
- iii. Whistleblowers reporting in good faith will be fully protected from retaliation.

Violations will result in disciplinary action, including termination and referral to law enforcement under the Sexual Offences Act (2006).

### **5. Procedures**

#### **5.1 Getting Help**

Workers should first consult their immediate supervisor. If the supervisor is not trusted or implicated, workers may use alternative confidential channels, including:

If not possible, they may escalate to:

- i. Next level of management
- ii. SEA/SH Focal Points or dedicated grievance entry points

iii. Human Resources (HR) Manager

## **5.2 Discipline**

- i. All workers must comply with this Code.
- ii. Violations will result in warnings, suspension, or termination.
- iii. Supervisors who ignore or condone violations will also face similar disciplinary measures
- iv. Retaliation against anyone reporting misconduct in good faith is prohibited and treated as a zero-tolerance violation, with immediate disciplinary action

## **6. Implementation of the Code of Conduct**

The Code of Conduct is a condition of employment under KEWASIP. Each worker must sign it as part of induction.

### **6.1 Method of Delivering the Code**

- i. Induction Package – reviewed during orientation.
- ii. One-on-One Training – reinforced in toolbox talks and staff meetings.
- iii. Employee Handbook – a copy will be available at site offices.
- iv. Notice Boards – summaries displayed at worksites.

## **7. Monitoring the Implementation of the Code**

- i. Workers understanding will be checked through training and discussions.
- ii. Feedback will be collected to identify areas needing clarification.
- iii. Refresher sessions will be conducted if gaps in understanding arise.

## **8. Breaches of the Code of Conduct**

Consequences of violating this Code include:

- i. Written notices for misconduct.
- ii. Suspension or termination for repeated or serious breaches.
- iii. Immediate dismissal for severe misconduct (e.g., GBV/SH, unsafe practices causing harm, or child abuse/exploitation).

- iv. Zero tolerance for retaliation against reporters or whistleblowers.

**9. Code of Conduct Certification**

As a KEWASIP project worker, I certify that:

- i. I have read and understood this Code of Conduct.
- ii. I understand my responsibility to comply with its provisions and report violations.
- iii. I commit to upholding its standards at all times.

**Worker's Details**

Name: \_\_\_\_\_

Job Title/Role: \_\_\_\_\_

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

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

**Supervisor's Details**

Name: \_\_\_\_\_

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

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

## Annex 2: Sample of GBV Referral Centers and Service Providers in Marsabit and Garissa Counties

### Marsabit County

Organization	Address	Contacts
1. <b>County Department of Tourism, Culture Gender and Social Protection.</b>	All the 4 subcounties Saku, Moyale, North Horr,Laisamis	P.O.BOX 100-60500, Marsabit County
2. <b>Saku Accountability Forum</b>	Saku but serves all counties	<a href="http://sakuaccountabilityforum.blogspot.com..gorqorti@gmail">http://sakuaccountabilityforum.blogspot.com..gorqorti@gmail</a>
3. <b>Marsabit Women Advocacy Development organization. MWADO</b>	All the 4 sub- Saku, Moyale, North Horr,Laisamis	P.O. Boxes 102-60500 Marsabit .
4. <b>Community initiative and facilitation Assistance (CIFA)</b>	4 sub-counties Saku, Moyale, North Horr,Laisamis	CIFA KENYA P.O BOX 364-60500 MARSABIT

5. <b>Marsabit Level 4 hospital trauma centre</b>	Serves all sub counties	Marsabit level 4 Hosipital
6. <b>Pastoralists women for health and Education</b>	All 4 sub counties in Masarbit	<a href="mailto:pastoraliststwomentheducation@yahoo.com">pastoraliststwomentheducation@yahoo.com</a>
7. <b>Marsabit County Commissioners Officer under the Ministry of Interior and Coordination of National Government</b>	All the sub-counties	County Commissioners Building, All sub counties HQs

### Garissa County

Organization	Contact Person	Contacts
9. <b>County Department of Tourism, Culture Gender and Social Protection.</b>	Project Manager	Fatuma Maalim
10. <b>Women Education and Health for Development</b>	County Director	Hudson Mwangu

<b>(WOHED)</b>		
11. <b>SDFGA</b>	Regional Project Coordinator	Moses Ouma
12. <b>National Council for Population Development</b>	Manager	Sarah Muasya
13. <b>Refugee Consortium of Kenya</b>	Programme officer	Fesal Warsame
14. <b>The Kesho Alliance</b>	Programme Officer	Abdishukri Jelle
15. <b>Muslims for Human Rights (MUHURI)</b>	AOI	John K. Marete
16. <b>National Government of Administration officers (NGAO)</b>	Founder	Mulibo Idle
17. <b>Girl Concern organization</b>	Coordinator	Amran Ali Gabow
18. <b>Garissa Rural Water and Sanitation Company</b>	Hydrologist	Francis M. Maina
19. <b>OPPP</b>	SPPC	Victor A. Asenga

20. <b>Ministry of Labour</b>	Labour Officer	Adan Hassan
21. <b>Haki na Sheria Initiative (HIS)</b>	Programme Officer	Bare Adan
22. <b>Action Aid</b>	Coordinator	Yussuf Abdi
23. <b>NACADA</b>	Programme Officer	Sarah Kerubo Meshack
24. <b>Gender Department</b>	Deputy Director	Ahmed M.Abdi