



Liberia Sustainable Management of Fisheries Project (LSMFP)

National Fisheries & Aquaculture Authority

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Liberia Sustainable Management of Fisheries Project (LSMFP)

Gender-Based Violence, Sexual Exploitation and Abuse and Sexual Harassment Action Plan



Fish Mongers, Fishermen and Community members on a regular day in Grad Kru County at a fishing landing site. Taken by Enumerators in Grand Kru for the LSMFP GBV-SEA/SH Action Plan

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List of Acronyms

CARI	Central Agricultural Research Institute
CMA	Collaborative Management Association
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESS	Environmental and Social Standards
FAO	Food and Agriculture Organization
FGD	Focus Group Discussion
FGRM	Feedback and Grievances Redress Mechanism
GBV	Gender-Based Violence
GPN	Good Practice Note
GIIP	Good International and Industry Practice
IDI	In-depth Interview
KII	Key Informant Interview
LAFA	Liberia Artisanal Fishermen Association
LSMFP	Liberia Sustainable Management of Fisheries Project
LNP	Liberia National Police
M+E	Monitoring and Evaluation
MoA	Ministry of Agriculture
MoGCSP	Ministry of Gender Children Social Protection
NaFAA	National Fishery and Aquaculture Authority
REOI	Request for Expression of Interest
SEA	Sexual Exploitation and Abuse
SH	Sexual Harassment
SMF	Sustainable Management of Fisheries
WB	World Bank
WBS	Work Breakdown Schedule

1. Introduction

The bedrock of societal growth and socio-economic development is the full involvement of women, girls, boys and men within an encompassing environment wherein their potentials are enhanced and utilized without cultural hindrances, social inhibitions, or regulatory restraints. The risks of sexual exploitation and abuse, sexual harassment, and gender-based violence remain impediments to women and girls particularly in patriarchal societies, maintaining the gender-bias power dynamics and economic structures that exist within those societies.

The Liberia Sustainable Management of Fisheries Project (LSMFP) with support from the World Bank was designed to improve the fisheries sector as well as the management and utilization of selected fisheries. Among the relevant principles of the project is its accord with Liberia's Gender Policy and the World Bank Group Gender Strategy 2016–2023 which includes targeted interventions for improving human endowment such as health and sanitary practices, nutrition, access to improved technologies; women and men's access to income generating opportunities; and, women's access to entrepreneurship and enhancing women's role in community-led fisheries management.¹The project support to women in fishing communities seeks to close gaps across all four pillars of the gender strategy: (i) Improving Human Endowments; (ii) Removing Constraints for More and Better Jobs); (iii) Removing Barriers to Women's Ownership of and Control over Assets; and (iv) Increasing Voice and Agency. The National Fisheries and Aquaculture Authority (NaFAA) in further efforts to align its activities with critical milestones of the project circulated a REOI (Reference No: LR-NAFAA-162597-CS-INDV) for consultancy services to develop a Sexual Exploitation and Abuse, Sexual Harassment and Gender-based Violence, (SEA/SH & GBV) Action Plan for the project.

In response to a solicitation for individual consultancy to conduct a risk assessment for the development of a GBV-SEA/SH Action Plan for the LSMF project, a service agreement was concluded with the NaFAA on May 17, 2023.

The development of the plan required a risk assessment which was conducted between May and July 2023. The primary objective of the risk assessment was to identify and evaluate potential risks of Gender-Based Violence (GBV), Sexual Harassment (SH), and Sexual Exploitation and Abuse (SEA) that could emerge during the project's implementation. The aim was to develop a comprehensive GBV/SH/SEA Action Plan that provided guidelines and mechanisms for preventing and managing these risks effectively.

The scope of the assessment involved a thorough evaluation of risk factors related to GBV/SH/SEA that were inherent in the implementation of the LSMF project. This included examining the baseline social context on gender and GBV, considering poverty rates, the role of women in the fisheries industry, and prevalence rates of different forms of GBV in the project area. Additionally, the potential

¹ IDA Project Appraisal Document on the proposed credit to Liberia; Report No:PAD3767

project impacts on GBV/SEA/SH risks were analyzed, including project activities, labor influx, social patterns, and women's roles in the fisheries industry.

Community engagement targeting women were conducted to gather input on health and safety concerns and assess potential positive and negative impacts of the project on their lives. Their inputs were vital for developing targeted and effective GBV risk prevention, mitigation, and response recommendations.

The GBV/SH/SEA risk prevention and response recommendations encompasses various measures, including strategies to prevent and mitigate potential GBV/SH/SEA risks in alignment with the World Bank's Good Practice Note on Addressing SEA/SH.

The geographical scope of the assessment covered project sites within Montserrado, Maryland, Sinoe Margibi, Grand Bassa, Bomi, and Grand Kru Counties. This comprehensive risk assessment and the subsequent GBV/SH/SEA Action Plan are critical in promoting a safe and respectful environment within the project's scope and protecting the rights and well-being of all individuals, particularly women and vulnerable groups. The findings and recommendations are herein reported.

This report highlights findings from the GBV risk assessment and the LSMF project's GBV-SEA/SH Action Plan to guide the implementation of the LSMF project. The assessment has determined² that the GBV-SEA/SH risk is High.

2. Liberia Sustainable Management of Fisheries Project Background

The Government of Liberia, with support from the World Bank, rebuilt Liberia's fish stocks to recovery status that had significant impact on artisan fishery through increased landings by artisan fishers. To further harness the benefits from this impact, the Government of Liberia sought further assistance from the World Bank Group to support Sustainable Management of Fisheries (SMF) in Liberia to improve the management and utilization of selected fisheries which would provide additional resources to increase revenues, improve income and ensure food security.

The development objective of the LSMF project is to improve fisheries management and enhance livelihoods in selected fishing communities, through the provision of needed support to the country to maintain or increase priority fish stocks and the benefits that they provide, improving management and governance of fisheries, and improving value-addition of fish and fish products. The project would also develop an integrated fish landing and handling facility for the canoe and the industrial fishing fleets in Monrovia that combines the industrial fisheries' needs with those of the artisanal sector.

² During the recent implementation status mission, the project's meetings with project management unit staff also underscored high incidences of GBV/SEA/SH perpetrated against women and girls, in project counties, by fishermen.

2.1. Project Context

Artisanal fishery is estimated to provide a means of livelihood for about 33,120 full-time fishermen and processors in both marine and inland waters, about 61% of whom are Liberians and 60% females.³ Aquaculture development in Liberia dates to the 1950s when experiments with common carp, African catfish and tilapia varieties were conducted in small dugout ponds at the now Central Agriculture Research Institute (CARI) in Bong County. An unprecedented annual production of 45 tons was achieved in 1989, just prior to the onset of the civil crisis. However, Liberia's aquaculture sector is currently miniscule, despite a suitable natural environment, which Liberia offers as a potential investment destination for aquaculture.

See below the project's components:

Component 1: Improving management and governance of fisheries-This will focus on improving governance and management reforms; developing human and institutional capacity; improving policies, strategies, institutional and legal frameworks to make them climate smart; and other relevant activities that are aimed at improving fisheries management and marine environmental health and resilience to climate change.

Component 2: Improving value-addition of fish and fish products- This component is targeted at enhancing additional value to fish and fishery products in Liberia.

Component 3: Support to Aquaculture-This component holds a largely untapped potential for Liberia and other countries in the sub-region.

Component 4: Project Management- This component will support the implementation, management, coordination, and oversight of the project, including establishing and implementing a simple and smart monitoring and evaluation (M&E) system where a climate risk screen tool will be integrated throughout project implementation to identify risks, communication, awareness, and training of the implementing entities on applying the World Bank's Environmental and Social Framework (ESF)/Environmental and Social Standards (ESS), World Bank Group ESHS Guidelines and Good International Industry Practice (GIIP).

Component 5: Contingent Emergency Response Component (CERC)-The objective of this component is to provide immediate response to an eligible crisis or emergency, as may be presented in the future.

The main project beneficiaries are the fisheries communities comprising artisanal and semi-industrial fishers, and others in the fish value chains including stakeholders working in the processing and retail sector and fish consumers. The beneficiaries comprise an extensive fishing community of over 11,000 fishers using some 3,300 canoes which directly support around 56,000 people, including small-scale fishers. Additionally, fish processors and sellers account for an estimated 33,000 people. While the project has a national scope, its maritime fisheries support focuses on coastal counties. Ultimately, a

³ Feedback & Grievance Redress Mechanism (FGRM); October 2022

GBV-SEA/SH guided LSMF project that is geographically spread, ethnically inclusive, and demographically encompassing coupled with a routine and purposeful monitoring framework builds upon the gains acquired from recovered fishery stocks interventions to improve the fisheries sector, increase income, and further enhance efforts to acquire food security.

Total respondents for the assessment were 213 FGD participants and 30 KII respondents comprising a recorded total of 243 participants. Among the criteria for participation in the FGD were gender, age, and livelihood type. Respondents for the KIIs included the NaFAA, MoGCSP, community leadership, LAFA, WACPS, local government officials, LNP, and CMA. Sampled communities were selected based on the guidance provide by NaFAA. The spread of the sample for the collection of qualitative data comprised 38% allocation to communities adjoining fishery site and 62% allocation to knowledgeable informants.

3. Definition of Concepts

Key concepts highlighted in this document are; Gender-Based Violence (GBV), Sexual Harassment (SH), Sexual Exploitation and Abuse (SEA) and Survivor centered approach. These are explained below as defined in accordance with the World Bank GPN on GBV-SEA/SH:⁴

- a. **Gender-Based Violence (GBV):** The GPN defines Gender-based violence (GBV) an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed (i.e., gender) differences between males and females. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. The GPN also references the Inter-Agency Standing Committee (IASC) conceptualization of GBV. GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence, including threats of such acts, coercion, and other deprivations of liberty. Globally, women and girls are disproportionately exposed to and affected by GBV. This also includes harmful practices between individuals, families, and the community. These include sexual violence, domestic or intimate partner violence, human trafficking, forced and early marriage, and other cultural practices that cause harm. Different forms of gender-based violence can occur in a workplace, which must be made known to every worker as part of their induction course into the project. *These include but are not limited to*
- Bullying, physical and verbal abuse from work colleagues, supervisors, or managers.
 - Sexual harassment and unwanted sexual advances.
 - Sexual abuse and violence, including 'coercive' or transactional sex, rape, and sexual assault.
 - Psychological abuse and intimidation.
 - Threats and acts of physical and sexual violence.
 - Inadequate or inappropriate sanitary facilities and rules about their use.

⁴ World Bank Group. (2020). Environmental & Social Framework for IPF Operations: Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works, Second Edition.

b. **Sexual Violence:**⁵ Acts of a sexual nature against one or more persons or that cause such person or persons to engage in an act of a sexual nature by force, or by threat of force or coercion, such as that caused by fear of violence, duress, detention, psychological oppression or abuse of power, or by taking advantage of a coercive environment or such person's or persons' incapacity to give genuine consent. Forms of sexual violence include rape, attempted rape, forced prostitution, sexual exploitation and abuse, trafficking for the purpose of sexual exploitation, child pornography, child prostitution, sexual slavery, forced marriage, forced pregnancy, forced public nudity, forced virginity testing, etc.

c. **Sexual Exploitation and Abuse (SEA):** The GPN defines SEA as

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

Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 5)

d. **Sexual Harassment (SH):** SH refers to 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, not between staff and project beneficiaries or communities. The distinction between SEA and SH is important so that the institution's policies and staff training can include specific provisions on the procedures to report SEA and SH. Both women and men can experience SH.⁶

e. **Survivor-centered Approach:** The survivor-centered approach is based on a set of principles and skills designed to guide professionals—regardless of their role—in their engagement with survivors (predominantly women and girls but also men and boys) who have experienced sexual or other forms of violence. The survivor-centered approach aims to create a supportive environment in which the survivor's interests are respected and prioritized, and in which the survivor is treated with dignity and respect. The approach helps to promote the survivor's recovery and ability to identify and express needs and wishes, as well as to reinforce the survivor's capacity to make decisions about possible interventions.

f. **Discrimination:** Discrimination is any unfair treatment or arbitrary distinction based on a person's race, sex, religion, nationality, ethnic origin, sexual orientation, disability, age, language, social origin or other status. Discrimination may be an isolated event affecting one person or a group of persons similarly situated, or may manifest itself through harassment or abuse of authority.⁷

g. **Survivor:** any person(s) who experiences any form of GBV.⁸

⁵ (UN Glossary on Sexual Exploitation and Abuse 2017, pg. 8)

⁶ Good Practice Note on Addressing SEA/SH in HD Operations (2022)

⁷ [UN Women | UN System Coordination - Anti-harassment](#)

⁸ National Standard Operating Procedures for Prevention of and Response to Gender-Based Violence in Liberia (2019 – 2023)

- h. **Perpetrator:** A person who commits, an illegal or criminal actor carries out a harmful, illegal, or immoral act.
- i. **Consent:** Per the GPN, consent is a key consideration in GBV particularly with regards to SEA/SH. GBV arises when consent is not voluntarily and freely given. Consent must be informed, based on a clear appreciation and understanding of the facts, implications and future consequences of an action. In order to give consent, the individual concerned must have all relevant facts at the time consent is given and be able to evaluate and understand the consequences of an action. The individual also must be aware of and have the power to exercise the right to refuse to engage in an action and/or to not be coerced (i.e., by financial considerations, force or threats). There are instances where consent might not be possible due to cognitive impairments and/or physical, sensory, or developmental disabilities.
- There is no consent when agreement is obtained through:
 - The use of threats, force or other forms of coercion, abduction, fraud, manipulation, deception, or misrepresentation;
 - The use of a threat to withhold a project benefit to which the person is already entitled; or
 - A promise made to the person to provide a benefit from the project.

4. Technical Guidance Documents

The development of the Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) Action Plan was guided by several key documents:

World Bank Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works: This Good Practice Note serves as a valuable tool and guide for Borrowers to identify risks related to GBV, SEA, and SH that may arise in World Bank Investment Project Financing with major civil works contracts. The note draws from the World Bank's experience and good international industry practices, along with insights from other development partners. It emphasizes prevention, risk minimization, and management, particularly focusing on the exploitation of

vulnerable positions, power dynamics, and trust for sexual favors, as well as unwelcome sexual advances and physical contact, which are forms of GBV most likely to be aggravated by the investment projects.

ILO Convention on Harassment (ILO C190): This convention aims to eliminate workplace violence and harassment, envisioning a future with conducive work environments built on dignity, respect, and devoid of violence and harassment. It recognizes that violence and harassment in the work environment constitute human rights violations and are incompatible with decent work principles. By focusing on ensuring equal opportunities and promoting a violence-free workplace, ILO C190 complements efforts to combat GBV, SEA, and SH in Liberia's workplaces.

Liberia’s Civil Service Human Resources Policy Manual: As the central government agency responsible for human resources management in Liberia, this manual contains essential information on sexual harassment in the workplace. It provides definitions, outlines different types of sexual harassment, and highlights the procedures for reporting incidents of sexual harassment. This manual serves as a critical reference for addressing SH issues within the civil service and can inform broader efforts to combat SH in various sectors across the country.

World Bank Environmental and Social Framework

The World Bank is committed to ensuring that its development projects are economically viable and environmentally and socially sustainable. To achieve this, they have implemented the Environmental and Social Framework (ESF), which provides policies and standards that guide their projects towards being socially responsible⁹.

One of the key areas that the ESF focuses on is addressing the risks of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), and Gender-Based Violence (GBV) in project design, implementation, and monitoring. The ESF recognizes that these risks can significantly impact project beneficiaries, particularly women and vulnerable groups, and emphasizes the need for client countries and project stakeholders to create measures to prevent, mitigate, and respond to these risks. The ESF has a specific section on SEA/SH and GBV risks, which requires the Bank to identify and assess the risks in their projects. Borrowers must also develop and execute SEA/SH prevention and mitigation plans. The ESF guides the following key aspects related to SEA/SH and GBV risks¹⁰:

- **Policy & Institutional Framework:** The framework encourages client countries to establish policies, laws, and regulations that address SEA/SH and GBV risks. This ensures that a legal and institutional framework is in place to prevent and respond to such incidents. It also promotes a culture of respect, non-discrimination, and zero tolerance for SEA/SH and GBV.
- **Project Screening & Assessment:** The ESF requires identifying and assessing SEA/SH and GBV risks during the project preparation stage. This includes evaluating potential risks and impacts on affected populations, particularly women and vulnerable groups, and designing appropriate measures to mitigate these risks. This helps to ensure that risks are identified early and that proper measures are implemented to prevent harm to project beneficiaries.
- **Grievance redress mechanisms:** The ESF emphasizes the importance of establishing effective and accessible grievance redress mechanisms to address complaints about SEA/SH and GBV. These mechanisms should allow affected individuals to report incidents, seek support, and access remedial measures safely and confidentially. This ensures that project beneficiaries have a safe avenue to seek redress if they experience any form of SEA/SH or GBV.

⁹ <http://www.worldbank.org/en/topic/gender>

¹⁰ Addressing Gender-Based Violence in Investment Project Financing involving Major Civil Works (worldbank.org)

- **Monitoring & Reporting:** The Bank encourages client countries and project stakeholders to enhance their capacity to prevent, respond to, and manage SEA/SH and GBV risks. This includes training and awareness programs for project staff, contractors, and affected communities to promote a culture of respect, non-discrimination, and zero tolerance for SEA/SH and GBV.

Finally, the ESF requires monitoring and reporting on SEA/SH and GBV risks and incidents throughout the project lifecycle by regularly reporting on the implementation of prevention and mitigation measures, the effectiveness of grievance redress mechanisms, and actions taken to address incidents. This helps ensure that risks are continuously monitored, and appropriate measures are taken to address any possible incidents. The World Bank aims to create a safe and inclusive environment for project beneficiaries and stakeholders by following these provisions.

5. GBV-SEA/SH Risks Assessment Findings

5.1. Gender Inequality in Liberia

Liberia continues to grapple with significant economic difficulties, as indicated by the projected year-on-year GDP growth of 4.7% for 2023. Additionally, inflation reached 6.75% in the third quarter of 2022, and it is anticipated to rise further in 2023. This inflationary trend in Liberia's economy is concerning as it highlights the growing risk factors related to gender inequalities.¹¹

The economic challenges faced by Liberia are compounded by its low ranking on the Human Development Index (HDI). Currently, Liberia ranks 178th out of 191 countries, with a development index of 0.481. This low HDI value reflects various indicators such as a relatively short life expectancy at birth (estimated at 60.7 years), expected years of schooling of 10.4 years, and a mean years of schooling of 5.1 years. For women and girls in Liberia, the HDI is even lower at 0.447, indicating fewer expected years of schooling and lower mean years of schooling.¹²

Gender inequality is pervasive in Liberia and result in unequal power dynamics between genders, limited access to essential services and opportunities, underrepresentation in governance systems, and a lack of access to legal and judicial services. Women's limited participation in all aspects of life often leads to poor development outcomes, reflected in low performance across various development indicators.¹³

While there have been some advancements for women in terms of increased access to education, improved economic roles, and greater involvement in political and social spheres following Liberia's civil war, the situation and status of most women, especially those in rural areas during the post-conflict period, have not improved significantly. Despite women comprising 49.6%,¹⁴ of the population, they experience negative development outcomes compared to men. Gender inequalities permeate all aspects of Liberian society, and women are disproportionately underrepresented.

¹¹ Data sourced from CBL Financial & Economic Bulletin; Vol. 23 No. 2; April-June 2022-pg 4 & 15 <https://www.cbl.org.lr>

¹² Human Development Index Report (2022) <https://worldpopulationreview.com/country-ranking>

¹³ UN Women Liberia, August 2021, 'Liberia Country Gender Equality Profile' pg18-19.

¹⁴ [Liberia announces provisional results of its 5th National Population and Housing Census | United Nations in Liberia](#)

Gender inequality and the marginalization of women in Liberia persist due to socio-cultural norms, values, and perceptions that uphold male dominance and the subordination of women. Society assigns different roles and positions to women and men, girls and boys, which often restricts women's participation in socio-economic and political spheres. As a result, women face numerous barriers, including sexual and gender-based violence.¹⁵ They also contend with challenges such as restricted access to finance and markets, and inadequate representation in leadership and governance positions. These inequalities hinder women's rights to land, ownership, and access to resources, as well as impede gender-responsive economic growth and development.

5.2. The Situation of SEA/SH in Liberia

The situation of Sexual Gender-Based Violence (SGBV) in Liberia is a significant concern. Women and girls face violence in all aspects of their lives, whether at work, school, home, or public spaces. While S/GBV is vastly underreported, sexual assault and rape are the most reported violent crimes in Liberia.

Reporting of SGBV cases has remained high in 2022 and is expected results of the continuous awareness raising on SGBV prevention and more streamlined reporting conducted by the National SGBV Taskforce, inclusive of national stakeholders and the Spotlight Initiative team. According to data from the MOGCSP GBV-IMS (2022), a total of 2,034 perpetrators (13f; 2021m) have committed 1,975 SGBV cases reported in 2022, which is 214 cases more than those reported in the previous year. The most devastating trend is that 66 percent of all reported cases are rape cases, where 65% of all survivors are children below 15 more specifically 63,5% or 1,256 are girls and 34 or 1,7 percent are boys'.¹⁶

Despite efforts to encourage reporting, perpetrators often evade punishment due to official inefficiencies and corruption. This leads to survivors' fear of stigma and retaliation, resulting in very low conviction rate for reported rape cases.

The Liberian civil war (1989-2003) was marked by a significant prevalence of sexualized violence. According to civil society organizations, estimates suggest that between 61% and 77% of women and girls experienced such violence during the conflict.¹⁷ Even after the war, survivors continue to endure the consequences of psychological and physical trauma, social stigma, and the absence of sufficient and sustained psychological, legal, and economic support services.

Amid the Covid-19 pandemic, Liberia witnessed a surge in reported cases of Sexual and Gender-Based Violence (S/GBV). This echoes a disturbing pattern observed during the 2014-2016 Ebola crisis, where there was an "epidemic of rape, sexual assault, and violence against women and girls" in the region.¹⁸ The consequences of Covid-19 also gave rise to what was referred to as a "shadow pandemic",¹⁹ of violence, stemming not only from lockdown measures but also from the prolonged

¹⁵ UN Women Liberia, August 2021, 'Liberia Country Gender Equality Profile' pg3.

¹⁶ Liberia Spotlight Initiative Report , 01 January 2022 – 31 December 2022

¹⁷UN report urges Liberia to act on rape, 2016;

<https://www.ohchr.org/en/NewsEvents/Pages/DisplayNews.aspx?NewsID=20680&LangID=E>

¹⁸18 CGD, 2020; <https://www.cgdev.org/publication/pandemics-and-violence-against-women-and-children>

¹⁹UN Women Statement April 2020; <https://reliefweb.int/report/benin/rapid-gender-analysis-covid-19-west-africa-april-2020>

breakdown of social structures, food shortages, unemployment, school closures, and increased financial dependence.²⁰ In response to the escalating crisis, President George Weah declared Liberia to be facing an epidemic of S/GBV and declared a national state of emergency regarding rape in September 2020.²¹ Further, the government presented a national "Roadmap on Ending Sexual and Gender-Based Violence" 2020-2022, but there is little evidence that the current measures have led to a decrease in S/GBV.

Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) are two forms of Gender-Based Violence (GBV) that are severely underreported in Liberia. Both SEA and SH involve different types of abuse, exploitation, or harassment that disproportionately affect women, girls and key populations. The underreporting can be attributed to various factors, including social stigma, fear of retaliation, lack of trust in the justice system, and limited awareness of available support services. Additionally, in post-conflict and crisis-affected regions like Liberia, the existing challenges in reporting and addressing GBV can further hinder survivors from coming forward.

Available data suggest that following:

The sexual exploitation of children remains a grave issue in Liberia,²² despite legal prohibitions against commercial sexual exploitation and child pornography. Girls continue to be exploited, often in exchange for money, food, and school fees. Secondary schools are particularly affected, with reports of teachers coercing girls into engaging in sexual favors in return for passing grades. Additionally, orphaned children are highly vulnerable to abuse and exploitation.

Sexual exploitation perpetrated against adults is also an issue. Individuals engaging in sexual transactions as a means of survival view these exchanges as their only source of income.²³ Factors contributing to the perpetuation of this issue include economic vulnerability, limited access to alternative income opportunities, fear of stigma and discrimination, and a lack of trust in the justice system. Power dynamics further discourage victims from reporting, as perpetrators exploit their control, creating a sense of entrapment.

The existence of sexual exploitation and abuse, and sexual harassment, has long been a concern in Liberia. The presence of the United Nations Mission in Liberia (UNMIL), aid actors, and lessons learned from prior peacekeeping missions have brought attention to this issue, increasing awareness of its prevalence in post-conflict Liberia.²⁴ The civil war left the country in turmoil, leading to widespread displacement, social breakdown, and heightened vulnerability, particularly among women and girls. Moreover, the awareness of the issue has highlighted the risk of sexual exploitation and sexual harassment associated with aid and development work in post-conflict Liberia. For example a Times Magazine ProPublica investigative report released in October 2018 exposed allegations of sexual exploitation and abuse (SEA) within the organization "More Than Me" in Liberia.²⁵ The report

²⁰20 <https://allafrica.com/stories/202109200436.html>

²¹<https://www.aljazeera.com/news/2020/9/12/liberia-declares-rape-a-national-emergency-after-spike-in-cases>

²²US Department of State, 2022 Country Reports on Human Rights Practices: Liberia, pg20, [[Liberia - United States Department of State](#)]

²³ UN Liberia, Office of the Victims' Rights Advocate, 'Overview of services available to victims of sexual exploitation and abuse in Liberia Report', March 2020.

²⁴Refugees International, April 2004, 'Sexual exploitation in Liberia: Are the conditions ripe for another scandal?' [[Sexual exploitation in Liberia: Are the conditions ripe for another scandal? - Liberia | ReliefWeb](#)]

²⁵ TIME USA & ProPublica, 'October 2018' A celebrated charity founded by an American set out to save girls from sexual exploitation. Did she do enough to stop the rape of girls in its care?' [[How More Than Me Became a Predator's Hunting Ground | Time](#)]

revealed that girls attending the organization's school in Monrovia were subjected to sexual abuse and exploitation by staff members. The incident sparked public outrage and triggered investigations by Liberian authorities and international organizations. The report highlighted the need for stronger safeguarding measures and accountability in aid and development organizations operating in vulnerable communities.

Sexual harassment, including "sex for grades" and "sex for school fees," remains a significant problem in workplaces and schools, despite awareness campaigns conducted through government billboards and notices. Reports of sexual assault and harassment involving government authorities have also been documented.²⁶

Cross-border trade, which economically empowers Liberian women, perpetuates gender-based violence and inequality. Women engaged in cross-border trade face challenges such as corruption, sexual harassment, and discrimination while transporting their products across borders.²⁷

Women's empowerment in employment encounters various obstacles. Gender-based violence remains prevalent in the workplace,²⁸ with daily incidents of sexual harassment and the reinforcement of conservative social and cultural gender norms. These factors contribute to the marginalization of women in certain professions and their relegation to lower-ranking positions. Despite reforms promoting gender equality in workplaces, significant disparities in management-level positions persist.

Access to formal financial services and credit poses additional challenges for women entrepreneurs. Gender discrimination,²⁹ in accessing credit is not explicitly prohibited by law, leading financial institutions to consider women entrepreneurs and small and medium enterprises (SMEs) as high-risk clients, thus impeding their access to credit. The ownership of assets, particularly land and housing, further hampers formal credit accessibility, with women having lower rates of land ownership compared to men.

Liberia has legislation criminalizing same-sex sexual conduct, leading to significant biases and discrimination against lesbian, gay, bisexual, transgender, intersex, queer, and other gender and sexual minorities LGBTQI+ individuals. They face widespread stigma and discrimination, both in social interactions and various aspects of life, including employment, healthcare, and family acceptance. LGBTQI+ people are often excluded, harassed, and subjected to verbal and physical violence due to their sexual orientation or gender identity, resulting in fear and marginalization.³⁰ Due to additional barriers caused by discrimination, LGBTQI+ individuals are at an increased risk of sexual exploitation and harassment. They may engage in survival sex or be coerced into unwanted sexual acts in exchange for basic needs, such as shelter or necessities. Societal biases and discriminatory attitudes discourage victims from reporting incidents, as they fear further victimization and lack trust in the justice system. This creates barriers to seeking help and pursuing legal action against perpetrators.

²⁶ US Department of State, 2022 Country Reports on Human Rights Practices: Liberia, pg16, [Liberia - United States Department of State]

²⁷ UN Women Liberia, August 2021, 'Liberia Country Gender Equality Profile' pg23.

²⁸ See above at pg63.

²⁹ See above at pg 43.

³⁰ USAID Liberia, GENDER EQUALITY AND SOCIAL INCLUSION Report [Gender and Social Inclusion | Liberia | Fact Sheet | U.S. Agency for International Development (usaid.gov)]

Despite constitutional provisions prohibiting discrimination against persons with disabilities, they face significant barriers in accessing education, healthcare, public buildings, and transportation on equal terms with others. Moreover, persons with disabilities lack equal access to social, economic, and political opportunities, making them one of the most vulnerable population groups in the country. Access to education is particularly challenging, with less than 1 percent of students in public schools having a disability, indicating that most school-age children with disabilities are out of school. Although some students attend specialized schools for the blind and deaf, this is usually limited to elementary levels. Discrimination against persons with disabilities extends to employment, housing, and healthcare. They are more likely to become victims of gender-based violence,³¹ as highlighted by the National Union of Organizations for the Disabled. These issues compound the vulnerability and marginalization faced by persons with disabilities, exacerbating their risks and challenges in society.

Sex work in Liberia is illegal and criminalized, driving it underground and making sex workers vulnerable to exploitation and abuse. Poverty and limited economic opportunities often lead individuals to engage in sex work as a means of survival. Sex workers face numerous challenges, including violence, harassment, and discrimination. They also have limited access to healthcare and social services, increasing their vulnerability to HIV/AIDS. Addressing the situation of sex work in Liberia requires a comprehensive and rights-based approach to provide support and protection to sex workers and address the underlying factors contributing to the issue.

5.3. Institutional capacity for S/GBV prevention and response in Liberia

Institutional capacity has seen some progress in the last 15 years, with investments aimed at strengthening public structures. The institutions responsible for S/GBV include the Ministry of Gender Children and Social Protection, Women and Children Protection Sections (WACPS) of the Liberian Police, the S/GBV Crimes Unit, the Ministry of Justice, "Sexual Crimes Court E" for hearing S/GBV cases, S/GBV One-Stop Centres established in various parts of the country, offering a comprehensive range of services, including police assistance, social work, and healthcare support for survivors, SGBV shelters and other relevant institutions and services forming part of the National Referral Pathway for S/GBV survivors. At the national level, there is a National S/GBV Task Force supported by 15 decentralized S/GBV Task Forces through which local authorities, ministries, CSOs, and traditional leaders work together to coordinate S/GBV interventions. However, insufficient resources and a lack of political will and competencies hamper the work of actors to adequately implement mechanisms and services. While S/GBV shelters and the WACPs are attached to government ministries and agencies, safe homes, which form the bedrock of the services have weak statutory lineage in government and are highly donor-dependent. The lack of government support and donor fatigue on safe home programs has contributed to the closure of most safe homes thereby leaving donor-funded infrastructure in ruins.

5.4. Legal and Policy Framework

This Action Plan on Gender-Based Violence, Sexual Harassment, Sexual Exploitation, and Abuse is in compliance with Liberia's laws and policies, as well as the World Bank Environmental and Social

³¹ US Department of State, 2022 Country Reports on Human Rights Practices: Liberia, pg22, [[Liberia - United States Department of State](#)]

Standards (ESSs) 2,3,4,5,6,7 & 8 that could trigger GBV-SEA/SH during project implementation. It aligns with the recommendations outlined in the World Bank Good Practice Note for Addressing Gender-Based Violence, Sexual Harassment, and Sexual Exploitation and Abuse (SEA/SH) in Investment Project Financing that involves significant civil works.

Other supporting conventions and country-specific policies that support the Gender-Based Violence, Sexual Harassment, Sexual Exploitation and Abuse Action Plan include the Liberian Constitution, ILO Convention 190 (Sexual harassment at work places), The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) in 1984; Convention on the Rights of the Child in 1993; Pro-Poor Agenda for Prosperity and Development (PAPD); Liberia's National Gender Policy 2018-2022; Phase III of the Gender-Based Violence National Action Plan 2018-2023; Liberia's Second Phase of the National Action Plan on Women, Peace and Security 2019-2023; National Social Protection Policy and Strategy.

5.5. Relevant in Country Laws

The implementation of existing laws in Liberia's judicial system faces challenges including deficiencies in gender-responsive budgets, limited resources, and capacity gaps.³² A Capacity Needs Assessment conducted by the Liberia Spotlight Initiative in collaboration with the United Nations (UN) and European Union (EU) focused on justice and security institutions' ability to prevent, protect, and respond to SGBV, human trafficking, and violence against women and girls. While some institutions have gained adequate knowledge and skills related to SGBV through post-conflict capacity-building efforts, they still lack the necessary logistical support to effectively carry out their responsibilities.³³

Despite inadequate financing for the implementation of existing policy frameworks, there is an increasing focus among Liberian policymakers on addressing GBV. This is reflected in the development of action plans and roadmaps for the consolidated implementation of laws and policies addressing GBV in Liberia. . For instance, the National Gender Policy 2018-2022 serves as the third national GBV action plan, setting strategic priorities for the prevention and management of SGBV across all counties, including Sinoe.

The relevant constitutional and legislative gender equality and women empowerment laws guiding the development of this Action Plan include:

- Liberia Penal Law, Title 26 Liberian Codes of Law Revised: The Liberian Penal Code contains provisions that address various offenses, including sexual offenses such as rape and sexual assault, as well as assault and battery. While it does not have specific sections dedicated solely to Sexual Exploitation and Abuse (SEA) or Sexual Harassment (SH), certain existing laws can be applied to prosecute cases related to SEA and SH.
- *The Domestic Violence Act, 2019* criminalizes some forms of violence and further establishes the structures to speedily respond to situations of violence against women. The Domestic Violence Act provides legal environment to empower various Actors and Professionals to deal more effectively with the problem of domestic violence.

³² Liberia Gender Equality Profile , August 2021, Pg 26.

³³ See above

- Amended Anti-Human Trafficking Act, 2021. The Act also sets up the Human Trafficking Management Board (HTMB) which provides technical advice to the Ministry to effectively respond to trafficking cases.
- *The National Gender Policy* seeks to promote the survival, development and protection of women and children in order to achieve equal status for them in society.
- New Rape Law 2005 (AN ACT TO AMEND THE NEW PENAL CODE CHAPTER 14 SECTIONS 14.70 AND 14.71 AND TO PROVIDE FOR GANG RAPE APPROVED: DECEMBER 29, A.D. 2005): Liberia's 2005 rape law, also known as the Rape Amendment Act, is a critical piece of legislation aimed at addressing the issue of sexual violence in the country. The law significantly strengthens penalties for rape and sexual offenses, reflecting the government's commitment to combat Gender-Based Violence (GBV).
- *Decent Work Act 2015*: The Liberia Decent Work Act, enacted in 2015, aims to ensure fair and decent working conditions for all employees in the country. As part of its provisions, the act explicitly prohibits sexual harassment in the workplace. Additionally, the act establishes a complaints and grievance mechanism, providing employees with a formal framework to report and seek redress for workplace grievances, including incidents of harassment or abuse.

5.6. Potential GBV-SEA/SH Risk Posed by the LSMF Project

Given the situation of GBV-SEA/SH in Liberia, large scale infrastructure projects face a substantial risk of causing or perpetuating SGBV, as the existing societal biases, discriminatory attitudes, and power imbalances contribute to a hostile environment. The use of private contractors by government actors, international/national non-governmental organizations and donors, including NaFAA, can create vulnerabilities in the provision of services. The presence of private actors may expose women, girls and marginalized people to increased risks of SEA and SH where sexual abuse is demanded in exchange for the project's benefits. Some of the increased risks are related to the lack of awareness and training on SEA, as well as the lack of an accountability framework and lack of disciplinary procedures. The influx of workers during the implementation of projects can lead to adverse social and environmental impacts on local communities, especially if existing resources are limited. Such adverse impacts may include increased demand and competition for basic social services.

According to the WB Good Practice Note(GPN) addressing GBV in Investment Financing involving major civil works (2020), there are several potential social and economic impacts that may arise due to the influx of workers during such projects, including increased demand for sex work and trafficking, forced early marriage, and transactional sex. The power dynamics within communities and households may shift, leading to a potential increase in Gender-Based Violence (GBV). Moreover, the inputs of workers in the area can contribute to inflation, affecting local consumers. Additionally, the labor influx can give rise to social conflicts within and between communities, influenced by cultural differences between the workers and the local population. This cultural gap may lead to an escalation of tensions and exacerbate issues related to communicable diseases, drug and alcohol use, violence, illicit behavior, and crime.

Indeed, it is crucial to acknowledge that the risks of GBV-SEA/SH, can involve not only external actors but also local-based actors or personnel who have access to the project. During community consultations, the NaFAA focal persons in the communities, all of whom are male, played a significant role in mobilizing the communities, fishmongers, and other relevant stakeholders. While there were no specific indications of exclusion or exploitation, it remains essential to prioritize gender balance and establish a multi-sectoral team within the counties. This diverse team would be responsible for linking the project to the beneficiaries, thereby reducing the risk of exploitation that may arise when decision-making power is concentrated in the hands of one individual. Creating a gender-balanced and inclusive team is particularly critical for the success of Subcomponent 2.2, which focuses on supporting women entrepreneurs with a dedicated budget of US\$2.00 million.³⁴ This subcomponent aims to primarily target women, and having a diverse team with representation from different sectors will help ensure objectivity in the selection of the component's beneficiaries

Additionally, the project will play a crucial role in supporting the establishment of a Fisheries Program at the University of Liberia.³⁵ While this initiative holds great potential for the development and improvement of the fisheries sector, it is important to acknowledge the existing risks of GBV-SEA/SH within the school system in Liberia. The school environment can indeed be a breeding ground for SEA and SH, as it involves interactions among students, faculty, and staff members. These risks may be exacerbated in cases where there is a lack of proper awareness, prevention, and reporting mechanisms within the educational institutions.

Generally, the potential risks created by the project may include but are not limited to the use of job-related threats or rewards to solicit sexual favors, exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior, as well as solicitation of any type of sex work and unwelcome touching or sexually explicit physical contact. These risks are heightened, particularly in large-scale infrastructure projects, where an influx of predominantly male workers is introduced to the community, leading to shifting power dynamics. The informal nature of their employment may result in a lack of background checks, and their presence in the community is often temporary. While opportunities for women to earn income through support for construction, maintenance, or catering exist; however, such employment is often temporary and insecure, presenting additional risks. The short-term nature of these opportunities may leave women in vulnerable positions, susceptible to exploitation and abuse. To mitigate these risks, it is crucial to prioritize awareness and training programs for all workers, including contractors, on recognizing and preventing harassment, exploitation, and abuse. Implementing robust accountability mechanisms and formal grievance procedures can further ensure that any incidents are addressed promptly and appropriately. Additionally, creating a gender-balanced and inclusive work environment can foster a culture of respect and gender equality, contributing to the safety and well-being of all stakeholders involved in project. This includes implementing robust safeguarding measures, promoting gender equality and LGBTQI+ rights, providing support services to survivors, and fostering a culture of respect and inclusivity.

³⁴World Bank Project Appraisal Document, LSMF Project, pg19.

³⁵ See above at pg14.

5.7. Community Consultations: County Specific Findings

This section presents descriptive and inferential analysis from the findings. Descriptive analysis reflects the socio-demographic characteristics of the participants of the assessment while the inferential analysis provides the existing knowledge of the project per county, the prevailing contexts and perceptions, and GBV-SEA/SH risk factors presenting challenges to the implementation of the project. The inferential analysis is articulated a continuum of six categories; Knowledge of the LSMF project; Community context and awareness; Project-related risk factors, Response and reporting mechanism for SEA/SH/GBV, Barriers to accountability, response and protection against SEA/SH/GBV, and Awareness and training available to community to mitigate SEA/SH/GBV.

'Most of the cases we just received from western cluster contractors some of them brought girls from Monrovia, Buchanan and other places abandoned and abused them when they are employed finally with the company'.

-KII, Bomi County

Bomi County

Bomi County is situated in the North-western region of Liberia and hosts an estimated population of 134,000,³⁶ across a land area of 746 square miles (1,900 km²) and has an estimated population density of 179 per square mile (71 per km²). Poverty rate in the county is measured at 98.8% with a declining trend of -0.13 and a dependency ratio of 102.³⁷ Although Bomi houses the national fishery hatchery, knowledge of the LSMF project is alarmingly non-existent amongst community residents and stakeholders.

The lack of project-related knowledge is compounded by the inactivity of the Klay Agriculture and Vocational Training Center (KAVTC) institute in Bomi County. This institution serves the western part of Liberia, encompassing Gbarpolu, Bomi, and Grand Cape Mount counties, for several years. Unfortunately, income-generating opportunities in Bomi are scarce, leading to unemployment. Private-sector investment has also been low, exacerbated by the closure of the Sime Darby palm plantation. However, there is some hope with the Western Cluster Liberia (WCL) iron ore mining company commencing operations in 2022, following a 25-year Mineral Development Agreement (MDA) signed between the Government of Liberia and the company in 2011. Additionally, there are a few privately owned farms that offer limited employment opportunities to the population.

Unfortunately, these limited opportunities merely provide temporary engagements and do little to uplift the dire socio-economic conditions prevailing in the county. This situation, coupled with a

³⁶ National Housing & Population Census, 2022 preliminary report.

³⁷ International Wealth Index, 2020; <https://globaldatalab.org/arcadata/profiles/LBRr101/>

growing population, presents numerous risk factors for the prevalence of SEA, SH and GBV among women, girls, and marginalized groups.

According to respondents, especially the MoGCSP office in Bomi, the most common form of SEA occurs in schools, with "sex for grades" being prevalent. Moreover, former and current workers of private sector entities perpetrate persistent non-support. Rape is also common within the County.

Already, the MoGCSP office has received reports of SGBV cases, particularly non-support and abandonment of children, as well as physical violence perpetrated by workers of the Western Cluster Company against women. The situation worsens when some workers hired from other counties move into Bomi with their intimate partners but later abandon them for new relationships, leaving these women without income and vulnerable to exploitation. To address these issues, the gender office has engaged in discussions with the Human Resource Department of the company, aiming to establish a gender inclusion unit that collaborates with MoGCSP to address gender-related matters in the workplace.

Minimum response mechanism to mitigate GBV-SEA/SH exists in the county with the MoGCSP providing a Gender Coordinator who is supported by an acting social worker. Together, they provide psychosocial counseling for GBV victims with some level of services to marginalized people. Though the Defense for Children International is integral to the organizational response to GBV in the county, the MoGCSP is challenged with a litany of GBV-SEA/SH response gaps that renders a comprehensive, supportive and active response mechanism more of an aspiration. Added to this are additional barriers which include the lack of code of conduct for organizations performing dedicated service.

Grand Bassa County

Grand Bassa County is positioned in the South-central region of Liberia with an estimated population of 294,000,³⁸ inhabiting a land area of 3,064 square miles (7,936 km²). Population density in Grand Bassa is estimated at 96 per square mile (37 per km²) which puts the county amongst the less densely populated counties in Liberia. In contrast to Bomi, knowledge of the LSMFP in Grand Bassa is adequate and was readily recalled by respondents. However, the recollection was more towards the historical context compared to an expected intervention by NaFAA and its partner. Poverty in the county is estimated at 97.9 with a declining trend of -0.06 and a dependency ration of 96.³⁹ While economy in Grand Bassa is significantly supported by the Arcelor Mittal mining company, complemented by other small and medium businesses that contribute to income-generating activities, unemployment remains a crucial factor as the GoL is the largest single employer. As a coastal county, fishing is a major mode of income and food security.

The respondent had a fair knowledge of the project unlike Bomi County. Some referenced past consultations they had attended and name few of the benefits they expect from the project such as the construction of the fishing landing cluster. However, respondents displayed a total lack of any

³⁸ National Housing & Population Census, 2022 preliminary report

³⁹ International Wealth Index 2020; <https://globaldatalab.org/areadata/profiles/LBRr101/>

conceptual mode through which they would be involved in the project collectively or individually. Indicative of this lack of conceptual involvement with the project whenever it commences is the absence of information sharing by project designers and planners. Continuous community-level information sharing seems essential and was recommended.

Indications from respondents suggest that GBV-SEA/SH is prevalent in the County and the fishery sector. Economically, women rely on the goodwill of fishermen to acquire commercial stocks of fish to pursue petty trading as fish mongers. This situation increases the level of vulnerability of women to SEA/SH/GBV.

Some of us who are in relationships with fishermen, when our men return from the Sea and come home, they just want to 'beat dumbboy' (translated as have sex). If we say no, sometimes they force us, beat us or give us silent treatment. They don't like to hear NO and to tell you the truth, not all the time a woman can be in the mood for it.

FGD, Grand Bassa County

The consultation reveals a concerning existence of domestic violence within homes, particularly concerning child support; respondents also highlighted rape as a grave concern in the county,

indicating a pressing need for measures to ensure women's safety and protection; the issue of gender-based violence in educational, business and employment settings. Women face pressure to engage in relationships with male authorities, power holders, or influential figures to secure job opportunities, work, business ventures, or scholarships. The issue of exploitation is also manifested

'You see me sitting down here, I had two children for a Mittal Steel man, he had his family in town. It was sweet from the beginning but right now to get support from him is very hard'

FGD, Grand Bassa County

in the fishery environment, where fishermen sometimes request sexual relationships from fish mongers. While direct requests for sex in exchange for being a priority buyer may not be common, a good friendship or sexual relationship with fishermen can increase the chances of favorable treatment. Additionally, the preference of fishermen to sell to buyers from different counties, who often come with more money, creates a situation where local buyers are at a disadvantage in competing for fish purchases. Establishing better relationships with fishermen becomes crucial for local buyers to improve their chances. In addition, some respondents reported that the abuse of drugs and alcohol in the county also affects their sector increasing risk of physical violence and limited respect for existing structures set up to mitigate conflict.

We are asking the Liberian government to help us by providing market funds. When we are empowered, we can say no to any man who approaches us inappropriately. It is important to

The respondents provided several examples of how investment or private sector interventions have contributed to the prevalence of GBV-SEA/SH in the County. Specifically, they highlighted the impact of workers from Arcelor Mittal, the steel and mining company operating in Grand Bassa County. One significant consequence of the company's presence is the contribution towards the demand for sex work. Further, some women have allegedly left their relationships to engage in new ones with company workers. This phenomenon has led to the breakup of families and created social disruptions in the community.

Additionally, there have been instances where workers fathered children with local women but either returned to their home counties after their contracts ended or remained in the county but refused to support their children. This situation has resulted in serious social and economic challenges for vulnerable women and children in the county. Respondents also cited economic imbalances, the lack of employment opportunities for men, and limited access to education as additional reasons for the occurrence of SEA/SH/GBV.

Indications are that there is a lack of confidence in the existing institutions such as the police and the MoGCSP. Women expressed the uncertainty that there is the unlikelihood that justice will be meted out to perpetrators when GBV-SEA/SH incidents are reported to these institutions. Within the context of the LSMFP, these present compelling vulnerabilities which increases risk factors for the project during implementation. Furthermore, response mechanism for mitigating GBV-SEA/SH appears limited with the mainstream institutions dedicated to any form response services being the police and the MoGCSP. In consideration of the limited logistical, technical, administrative and coordinating capabilities of these institutions, it is challenging to address GBV-SEA/SH incidents in the County.

Grand Kru County

Grand Kru County is located in the South-eastern-B region of Liberia and has an estimated population of 109,000,⁴⁰ covering a landmass of 1,504 square miles (3,895 km²). Similar to Bomi County, knowledge of the LSMFP in Grand Kru was more towards the historical context than an anticipated intervention. Respondents cited the exploratory visit of Blue Ocean that made overtures to their community particularly committing to the construction of a cold storage which did not happen. Indicative of this notification is the information gap between NaFAA and its partnering communities especially those communities situated within the LSMFP earmarked areas.

Because of poverty in our homes, I have no choice but to send my child to sleep with a Fanti man in exchange for plenty of fish, as her father doesn't have money to provide for us.
-FGD,
Grand Kru County

Contextually, Grand Kru is a remotely situated political subdivision of Liberia with lingering challenges affecting transportation, communication, supporting infrastructure particularly for the fishery sector, and aquaculture. Like most of Liberia's counties, the economy of the county depends on agricultural production from animal rearing, and crop cultivation. Poverty in the county is estimated at 99% with a declining trend of -0.05 which is compounded by a dependency ratio of 101.⁴¹ Against this dismal economic profile, unemployment is high which significantly affects women empowerment, vulnerability to SEA/SH/GBV; all of which increases the risk factors for the project. Findings from the respondents note the lack of capital as the principal driver for GBV-SEA/SH amongst women and girls. This situation is largely induced by the limited commercial activities, limited private sector investment, minimum industrial activities, and gender imbalance within the fishery sector which are

[We] are usually reluctant to report cases of SEA because ... they don't recognize SEA as exploitation in many cases. There is general reluctance in reporting cases of SEA due to fear of backlash from some community members.

-FGD , Grand Bassa County

⁴⁰ National Housing & Population Census, 2022; preliminary report

⁴¹ See above

potent drivers of risks factors posing challenges to the implementation of the project. There is a lack of a structure and functional response mechanism for GBV-SEA/SH within the county although the police and the MoGCSP have administrative presence. Despite the presence of these public service providers, respondents showed reluctance utilize these service providers for personal and institutional reasons. Personally, respondents suggested that reporting GBV-SEA/SH would signal ingratitude to someone who has been benevolent. Institutionally, the public service providers are either incapable to manage GBV-SEA/SH incidents due to circumstances beyond their control, or are not motivated to provide the required response. Indifference within community leadership or traditional leadership only exacerbates the situation.

Despite the risk factors that make women and girls in the fishery sector, especially fish mongers, more vulnerable, respondents strongly believe that economic empowerment is the most effective and long-lasting solution to prevent or reduce the occurrence of GBV-SEA/SH in this industry.

Additionally, the respondents noted further training for increased awareness and knowledge on SEA/SH/GBV. Limited knowledge and poor response infrastructures were suggested as barriers to the mitigation efforts against GBV-SEA/SH within communities. This is also indicative of the lack of a framework for referral pathway or there is total dysfunction where referral pathways are seemingly available.

Margibi County

Margibi County is part of the South-central region with an estimated population of 305,000,⁴² occupying a landmass of 1,010 square miles (2,616 km²). The economy of the county is largely based on agriculture with the Firestone Rubber Plantation being the largest agricultural investment supported by commercial trading and food crops farming. Margibi is a densely populated political sub-division of Liberia with a population density of 302 per square mile (116/km²) which factors into its poverty level. Poverty is estimated to be 97% with a declining trend of 0.61 that is expected to cushion a dependency ration of 95.⁴³ Although Margibi has the agricultural investment in Liberia, employment in agriculture for women is dismally low in comparison to men and is likely to remain as such for a much longer. Except for the service sector where women are active participants in petty trade, education, health, and domestic services they largely rely on their male partners for economic and financial support. The findings from the assessment indicate that information about the project has been disseminated to the communities. However, there is a growing anxiety surrounding the implementation of the key activities that were promised as part of the project. This uncertainty could potentially pose challenges for the project's ownership and success if the project team does not consistently communicate updates and information to the stakeholders involved. It is essential for the project team to ensure regular dissemination of relevant information to address the concerns and maintain transparency and confidence among the community members.

The assessment also revealed that women in the county's fishery sector mainly serve as fish mongers. Women in the fishery sector seem to perceive themselves mainly as fish mongers, and they believe their roles are contingent on the preferences of men who hold significant influence in the local fishery industry. The subservient role assumed by women constitutes a lingering risk factor for women and

⁴² National Housing & Population Census, 2022; Preliminary Report

⁴³ International Wealth Index 2020; <https://globaldatalab.org/areadata/profiles/LBRr101/>

remains a sectoral driver for the occurrence for SEA/SH/GBV. Power dynamics also stands out as another risk factor for women in the fishery sector. Artisanal fishing is male-dominated and is integral to the local sectoral structure wherein men determine to whom fish can be sold, when fish are sold, and at what price fish are sold. Such dominance is harmful to the long-term mitigation efforts to curb GBV-SEA/SH within the fishery sector locally and perhaps beyond. Response mechanism for GBV-SEA/SH would need to be strengthened as there is neither a structural referral framework for GBV-SEA/SH nor an active public service provider to deliver support services for survivors. The police and MoGCSP have presence in the county which are limited and overwhelmed with competing priorities. Participants confirmed that incidents of GBV-SEA/SH are reported to the police; however, they cited the role of medical Liberia as alternative community-based service providers who are helpful in providing support services for survivors. This suggests that the outreach and scope of the public service providers are limited and would need to be considered by the project during implementation.

*Fear of losing our boyfriends and husbands, is one thing that makes it hard for us to report these types of cases. –FGD
Margibi County*

Common forms of SEA/SH/GBV reported included fathers persistently not supporting their children, instances of intimate partner violence, men exerting control over women's income, and fishermen demanding sex in exchange for fish. Additionally, respondents reported that fishing landing sites can become breeding grounds for conflict due to disagreements on fish prices, failure to pay debts, and other common disputes.

Barriers to mitigation efforts of GBV-SEA/SH gathered from the participants were concerning relative to the considerations of the project during implementation. Women noted fear, threats and stigmatization as barriers impeding them from reporting such incidents and emphasized the need to establishing an effective response mechanism that will involve managing grievances.

*We have women groups, the commissioner, the town chief, the court, the police etc. if those things happen, these people are here to help and take the responsibility of what will take place.
-KII
Maryland County*

Maryland County

Maryland County lies in the South-east of Liberia spanning a total land area of 887 square miles (2,297 km²). The county has an estimated population of 172,000 with population density of 194 per square mile (75 per km²). Sixty percent of this population is engaged in farming as their source of livelihood. This is indicative of the poverty level which is estimated at 99% with a decreasing trend of -0.06 which reflect the dependency ratio of 93 that is slowly decreasing at -1.41.⁴⁴

Findings from the county assessment suggest the communities of intended project area have knowledge of the project; however, there are also high expectations being anticipated from the beneficiaries. With more than half of the population of the county relying on farming as the core economic activity, unemployment is alarmingly high. As such, artisanal fishing is strategically positioned to attract the unemployed over the medium-to-long term. Maryland's fishery sector is

⁴⁴ See note above

fraught with risk factors related to SEA/SH/GBV. First, the fishery sector is predominantly male-dominated. Second, there is a disturbingly high prevalence of sexual exploitation within the sector, primarily due to the significant unemployment rate among the partners of women. This exacerbates the vulnerability of women, which is further exploited by men in the sector. Third, women in the sector generally have low educational attainment, which hinders their awareness of their legal rights and their ability to address sexual exploitation and harassment as a means to achieve economic empowerment. Fourth, there are limited alternative options available for women to pursue economic empowerment.

Compounded, these constitute risk factors that the project would have to navigate for seamless implementation. Moreover, response mechanism for GBV-SEA/SH is less visible, less knowledgeable, less functional, and less pragmatic. Participants particularly from the fishery sector structures such as the CMA seem to have the perception that mitigating GBV-SEA/SH is the responsibility of “*someone else*” and not themselves. GBV-SEA/SH survivors at the community level are expected to report such incidents to some authority such as the Town Chief, Commissioner, or women’s group.

Montserrado County

Montserrado County is positioned in the South-central region of Liberia and holds more than one-third of Liberia’s population. It is the most populated county with an estimated population of 1.9 million⁴⁵ residing on a total land area of 738.5 square miles (1,912.7 km²) and the most densely populated county with a population density of 2,601 per square mile (1,004 per km²).

Montserrado’s economy is largely commercial trading which is massively cushioned by informal businesses. Poverty is recorded at 88% within the county with a declining trend of -0.15 and a dependency ratio of 74 which also has a declining trend of -0.63.⁴⁶ This profile is reflective of both the population size and density of the county. Findings from the assessment in the county indicate that knowledge of the project has been disseminated; yet, expectations appear to be high suggesting the articulation of the project might not be fully understood and requires some additional clarity.

The assessment notes that artisanal fishers and fish mongers expect the project to construct storage facilities, drying facilities, fridges, and renovate existing fishery-relayed structures. While these may be feasible from the perspective of the project, participants continuously cited their non-involvement in the project indicating they view the role only as recipients of donor assistance. This is concerning for the sustainability of the project post-implementation and would require some remedial action prior to, and during implementation. Within the context of the fishery sector, Montserrado shares similar findings with other assessed counties: Widespread poverty that continues to be exacerbated by growing unemployment; Male-dominated local fishery sectors that remain reluctant to greater or broader female participation; Lack of economic empowerment for women rendering them vulnerable to GBV-SEA/SH within the sectors; Timidity amongst GBV-SEA/SH survivors to utilize available GBV-SEA/SH response mechanism where available due to the prevalence of the culture of subdued silence; Lack of formal GBV-SEA/SH response mechanism with the local fishery sectors; Resource-limited

⁴⁵ National Housing & Population Census, 2022; Preliminary Report

⁴⁶ See note above

public GBV-SEA/SH service providers at local level; and, Fragile confidence amongst right-holders in the ability of duty-bearers to hold perpetrators of GBV-SEA/SH to account. These shared findings present surmountable risk factors for the project relative to GBV-SEA/SH within Montserrado as well. While the county has a more robust response mechanism available to GBV-SEA/SH survivors, its utilization within the fishery sector is plagued with subdued silence as well.

Common forms of SEA/SH/SGBV reported include economic violence perpetrated by fishermen against their partners who work as fishmongers. This is evident in the fishermen providing very limited fish stock for the women to sell and expecting the proceeds to cover all domestic expenses, leaving the women in a vulnerable economic position despite their significant time and effort invested in the trade. Furthermore, similar to other counties, fishermen demand sex in exchange for fish, and women who invest in canoes and fishing trips often find themselves deprived of their rightful share of the proceeds.

Moreover, as seen in other areas, fishing landing sites can become breeding grounds for conflict due to disagreements over fish prices, unpaid debts, and other common disputes. The abuse of drugs and alcohol among fishermen is also commonly cited as a contributing factor to conflicts and gender-related violence in the fishing communities.

The breakdown of family structures as a result of unemployment was also identified as a key concern in the County. Men's inability to support their families can shift the power dynamic and may lead to domestic violence or increase women's vulnerability to SEA/SH. The strain caused by unemployment can create tension and challenges within households, which, in turn, can escalate into harmful situations. Addressing unemployment and providing support for families in need is essential to promote stable family environments and reduce the risk of violence and exploitation against women.

*So, we want to ask the people to hire our brothers and sisters in the communities that will be benefiting from the landing site. Let make small money too
-FGD, Montserrado County*

The risk of SEA/SH is even higher in Montserrado County due to its status as the capital city with numerous economic activities. The urban environment and the concentration of economic opportunities can lead to increased vulnerabilities for individuals, particularly women and marginalized groups.

Sinoe County

Sinoe County, in South-eastern Liberia, is amongst the sparsely populated counties in Liberia. With an estimated population of 150,000 residing on a total land area of 3,914 square miles (10,137 km²), the population density of the county is 38 per square mile (15 per km²). Subsistence farming is the major economic activity in Sinoe as an alternative to the high unemployment level. Unsurprisingly, poverty is 98% which is experiencing a declining trend of -0.32 in addition to a dependency ratio of 92.⁴⁷

⁴⁷ International Wealth Index 2020; <https://globaldatalab.org/areadata/profiles/LBRr101/>

The assessment findings indicate that there is a significant lack of knowledge about the LSMFP, with information being almost non-existent. References to project activities appear to be based on assumptions from potential projects supported by other donors. It is crucial to clearly communicate to the communities the specific activities that will be implemented in Sinoe, the role of the forwarding base, and the distinctions between the LSMF activities and those of other projects. Clear and accurate information dissemination is essential to avoid any confusion and ensure the community's understanding of the project's scope and objectives.

All I know is that the fishery people said they are coming to build a cold storage for us to store our fish. They have activity for we the fish seller and that they are going to build a cold storage for us to keep our fish and a place for us to dried fish. -FGD.

Within the context of the project, Sinoe is an impoverished county with high poverty, low women empowerment, fragile framework for mitigating SEA/SH/GBV, and weak administrative and governance systems. Consequently, the inputs of the project could reinforce the existing misconception of the project to detrimental effects relative to the incidence of GBV-SEA/SH within the local fishery sector. Risk factors gathered also indicate additional articulation of the project is required prior to implementation. Participants of the FGDs mentioned that their involvement with the project was simply fish mongering. Considering the participants were solely women, there is an inherent risk for the project in its quest to quell GBV-SEA/SH within the local fishery sector. Furthermore, this implies women are neither aware of their evolving role as co-equals with men in the fishery local sector nor prepared to assume such roles. Additional risk factors associated with the project relative to GBV-SEA/SH are limited economic empowerment that increases vulnerabilities of women to SEA/SH/GBV, the culture of compromise resulting from subdued silence, and poverty. These risk factors pose a threat to the effectiveness of existing GBV-SEA/SH response mechanism at both community and county levels. As such, it is not inconceivable that these risks would adversely influence the project's response mechanism and strengthen cultural and institutional barriers to mitigation during implementation.

Summary of Community Consultations

Key Findings:

1. Knowledge of LSMF project largely information dissemination; not project articulation
2. Shared local context of prevailing poverty inducing high vulnerability of women
3. Numerous risk factors highlighted by structural and functional patriarchal sectoral dominance
4. Aspirational sectoral response framework, response mechanism and referral pathway
5. Evidence of abuse of power and sexual exploitation in labor practices
6. Limited participation of women and girls in decision making in the fisheries sector however the communities report a slight improvement in the situation
7. Subdued silence of survivors, communal/domestic compromises and indifference to public service provision for GBV-SEA/SH remain consequential barriers
8. Using only community conflict resolution methods may exacerbate the harm faced by survivors who come forward to report incidents of GBV-SEA/SH
9. Alcohol drug intake identified as contributing factors for GBV-SEA/SH
10. Fishing land sites breeding ground for conflict

6. Liberia Sustainable Management of Fisheries GBV-SEA/SH Action Plan

Project related GBV-SEA/SH risk	Mitigation measures/ Activities	Indicators	Responsible party	Timeline	Frequency of Monitoring	Means of verification	Budget
Risks related to SEA-SH committed by a project staff against other project staff(s) or project beneficiaries	Develop a GBV-SEA/SH Code of Conduct	# of code of conduct developed	PIU	Start of Project	Annually	Signed GBV CoCs	
	Conduct a GBV prevention training for project staff and other associated persons on Specific procedures to prevent and report SEA/SH-related complaints, including possible penalties during project implementation	# of Project related staff trained % of females and males trained	PIU	Start of project and every time a new team members is hired	Annually	Training attendance listings /training reports	
	Printing and signing of GBV Code of Conduct	# of copies printed # of Copies signed	PIU	Start of project	Annually	Signed and filed GBV CoCs	

Risks related to SEA-SH committed by contractors against other contractors and project beneficiaries	Verify the following criteria in every procurement process: <ul style="list-style-type: none"> • Incorporate ICB SPD requirements for addressing SEA/SH risks in NCB procurement processes. • Clearly define and explain the Code of Conduct (CoC) to bidders before bid submission. • Evaluate the contractor's SEA/SH Accountability and Response Framework before contract finalization. 	# Procurement documents mentioning SEA/SH risk mitigation measures. Rating of contractors' SEA/SH Accountability and Response Frameworks # of contracts where the SEA/SH Framework evaluation results influenced contract finalization decisions.	Social Development Specialist	Every procurement process	Quarterly	Approved Accountability and Response frameworks , signed CoCs,	
Risk related to lack of proper reporting mechanism for	Provide training for all members of the FGRC to ensure that they are fully sensitized and	# GRM focal points trained	PIU	Start of the project	Annually	Training attendance listings	

GBV project related grievances	capable of receiving and referring cases to the GBV SP.	% of females and males trained				/training reports	
	Conduct mapping of GBV- SEA/SH service providers	# of service providers available and accessible to support survivors	Social Development Specialist	Start of project	Annually	A comprehensive database of GBV- SEA/SH service providers within operational area; Reports summarizing the findings and analysis of the mapping exercise.	
	Enhance the skills of the Social Development specialist to ensure GBV prevention in interventions	Capacity needs assessment conducted Social Development specialist trained	PIU	Start of project	Annually	Capacity assessment report Training report	
	Recruit a specialized CSO to monitor and respond to gender related interventions(GBV Service Provider)	# of CSOs recruited across all project sites # of GBV grievances that have been referred to GBV service provider	PIU	Implementation	Annually	Grant Contracts , Progress Reports , Monitoring Reports	

Risks related to the lack of supervision and monitoring visits during and after project implementation	Develop talking points and facilitation guidelines to ensure that the implementation of the LSMFP SEP (Stakeholder Engagement Plan) adequately incorporates GBV-SEA/SH.	# of stakeholders consulted on GBV-SH/SEA . # Incidents or issues identified through consultations that led to project modifications. % of men and women consulted	Social Development Specialist	Start of project	Bi annually	Approved talking points/facilitation guide ; attendance listing ; consultation reports	
	Monitor contractors' operations to ensure that Codes of Conduct are signed and understood, contractor and workers are trained on GBV-SEA/SH, and an appropriate Accountability and Response Framework is in place.	# of contractors who have signed the CoC % of workers within contractor organizations who have received training on GBV-SEA/SH. # of visibility materials displayed with GBV-SEA/SH messages # of corrective actions or improvements initiated by contractors in response to identified issues.	PIU	Implementation	Bi annually	Assessment reports	

	Review the GRM's reception and processing of complaints to ensure that the protocols are being followed in a timely manner, referring complaints to the established mechanism to review and address SEA/SH complaints.	# of functional GRMs in operation	PIU	Implementation	Bi annually	Assessment reports	
	Share list of reporting channels with the community, project workers and staff (numbers, email addresses , location of reporting boxes, focal persons etc..).	# of persons (community, project workers and staff) who receive information on the reporting channels	PIU	Start of the project	Annually	Records of community workshops, meetings, or training sessions where the information was shared; Monitoring reports assessing the awareness and knowledge of reporting channels among the target audience.	
Risk related to lack of proper	Develop media and communication plan	# of Awareness activities conducted	PIU, Communic	Start of the project	Annually	Approved Communicati	

information dissemination	for disseminating GBV-SEA/SH project related information and messages targeting all actors(project staff, contractors, affected communities , GRM)	% of actors who report receiving awareness via at least one medium # of IEC materials developed # of IEC materials displayed in offices/project sites/community.	ations Consultant			ons plan, Monitoring reports , IEC materials, attendance listing from awareness activities	
Risk related to perpetuating negative gender norms and stereotypes through the project's intervention	Develop contractual clauses creating a mandate for contractors to actively recruit and employ women, promoting inclusivity and gender diversity within their workforce.	% of women and men of the project workforce	PIU/HR	Start of project	Annually	Inclusion of the clause in all post-action plan contracts. Listing personnel/co ntractors by geographical location, gender, etc.	
	Install sufficient electricity within and around project sites during construction	% of the project's construction timeline during which sufficient electricity is available within and around project sites	PIU , Contractor s	Implementatio n Implementatio n	Annually	Monitoring reports documenting availability of lights	

	Monitor the functionality of separate, safe and easily accessible facilities for women and men working on the site. Separate locker rooms and/or latrine, well-lit and include the ability to be locked from the inside	# of male bathrooms/lockers # of female bathrooms/lockers %of project workers who feel safe using the facilities	PIU /Contractors	Implementation	Annually	Photos , survey reports , construction records	
	Advocate for an increase in the number of women serving as NaFAA focal points in the county	# of new female focal points recruited during the project duration	PIU	Start of the project	Annually	Revised listing of NaFAA County Focal Points indicating an increase in number of women	

7. Prevention and Response Implementation Framework

SEA/SH related grievances shall follow the already existing GBV prevention and response framework of Liberia. The framework is a comprehensive approach designed to address the challenges of SGBV within the country. The framework aims to prevent incidents of SGBV and provide effective and compassionate responses to survivors. It encompasses various elements, including policy development, training, awareness campaigns, reporting mechanisms, survivor support, and perpetrator accountability.

However, as indicated in the context analysis, the framework does not always adequately address GBV-SEA/SH concerns due to several barriers including the normalization of SEA/SH which affects reporting and under resourced response structures. Hence the project's FRGM mechanism will ensure that GBV-SEA/SH related grievances are sensitively addressed and prevented.

The LSMFP has established an FGRM,⁴⁸ to address grievances arising from the project.. The existing FGRM has proposed the following channels for handling grievances at the community and national levels:

<p><i>Community Grievance Redress Committee (CGRC):</i></p> <p><i>In areas comprising</i> Liberian fisher folks and fish mongers:</p> <ul style="list-style-type: none"> ▪ Community Chairman ▪ Fishing Chief (1) ▪ Fish Monger (1) ▪ Fishermen representative (1) ▪ Youth Chairman ▪ Women Chairman ▪ Community Liaison 	<p><i>National Grievance Redress Committee Structure (NGRC):</i></p> <ul style="list-style-type: none"> ▪ NaFAA (secretary of the committee) ▪ Ministry of Gender, Children & Social Protection (MGCSP) ▪ Ministry of Agriculture (MoA) ▪ Ministry of Finance and Development Planning (MFDP) ▪ Environmental Protection Agency of Liberia (EPAL) ▪ Liberia Land Authority (LLA) ▪ Liberia Maritime Authority (LiMA)
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⁴⁸ NaFAA. (2022). Feedback & Grievance Redress Mechanism (FGRM) for the implementation of the Liberia Sustainable Management of Fisheries Project (LSMFP), P-172012, October 2022

<p>In areas comprising (Fantis & Kru or local), fisher folks and fish mongers:</p> <ul style="list-style-type: none"> ▪ Fanti Fishing Chief (Community Liaison for Ghanaian fishing community) ▪ Kru -Liberian Fishing Chief (Community Liaison for Liberian fishing community) ▪ Youth Leader-Fanti ▪ Youth Leader – Kru ▪ Women Leader – Fanti ▪ Women Leader – Kru ▪ Fish Monger – Fanti ▪ Fish Monger – Kru ▪ Community Chairman 	
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The FGRM is broad and includes other sectors, i.e. land, environmental and social impact, etc. Under this system, complaints will be filed following the system approved by the LSMFP at the community and national levels. Community level cases will be categorized into Liberian-centric communities and mixed communities of Liberians, Fantis, and Ghanaians. Unresolved grievances at the community level will be escalated to the National Grievance Mechanism.

Given the sensitivity of GBV-SEA/SH, the following accountability framework outlines the prevention and response mechanism for addressing GBV-SEA/SH grievances. The fundamental guiding principles for this framework include maintaining confidentiality, prioritizing a survivor-centered approach, ensuring a fair assessment, due process for all parties involved, and timely resolution.

7.1. Prevention Mechanism:

The LSMFP is committed to establishing a safe and inclusive environment for all project participants, including beneficiaries, staff, contractors, and community members. To uphold this commitment, robust GBV-SEA/SH prevention mechanisms have been put in place, aimed at raising awareness, adopting a survivor-centered approach, and cultivating a culture of zero tolerance towards any form of SEA/SH within the project's scope. The key elements of the prevention include

1. **Policy Framework:** The existing gender policy in NaFAA's HR Manual will be implemented, and all contractors and firms will be required to develop a PSEA/SH policy and action plan. These frameworks will outline the project's zero-tolerance stance and guidelines for addressing reported cases and will be accessible to all stakeholders.
2. **Training and Capacity Building:** A capacity building guide including awareness workshops, code of conduct sessions, and trauma-informed care training, has been proposed. See Section 8 below. The training plan is also designed and recommend in the Action Plan Template in section 6 above. These measures will equip all project personnel, contractors, and stakeholders with essential skills in SEA/SH prevention, recognition, reporting, and response.
3. **Reporting Mechanisms:** The existing FGRM does not yet include the contact details and location of reporting channels. While, the FGRM provides for designated personnel to receive reports and list the types of channels, it is important for communities to already be well informed of the reporting mechanisms well ahead of construction works or other project related activities. It is recommended that the FGRM is revised to include multiple accessible and confidential reporting channels, such as hotlines, online platforms, suggestion boxes, emails , Ministry of Gender Children Social Protection Officers in the to encourage reporting and protect survivor privacy.
4. **Whistleblower Protection:** The existing FGRM ensures anonymous complaints and maintains strict confidentiality to protect the identity of those making reports.
5. **Stakeholder Engagement:** The LSMFP SEP (Stakeholder Engagement Plan) incorporates GBV-SEA/SH measures. In addition, this action plan has recommended the development of facilitation guides for community engagement that promote a survivor-centered and ethical approach. These engagements also aim to raise awareness and educate communities on SEA/SH prevention.
6. **Awareness Creation:** The LSMP will develop a comprehensive communication plan to ensure appropriate messaging around GBV-SEA/SH is effectively communicated to the communities, project-related staff, and associates. Emphasizing visibility, the project will disseminate these messages in and around the project sites and offices through the distribution of Information, Education, and Communication (IEC) materials. Additionally, the use of media platforms and community engagement activities will be encouraged to reach a wider audience.
7. **Code of Conduct and Accountability:** A comprehensive code of conduct shall be developed and implemented, and any breaches related to SEA/SH are met with appropriate disciplinary measures and accountability, including penalties and enforcement mechanisms.
8. **Monitoring and Evaluation:** The project's M&E (Monitoring and Evaluation) shall be revised to incorporate activities outlined in the action plan. Continuous feedback is emphasized to improve and strengthen prevention efforts continually.
9. **Collaboration and Partnership:** The LSMFP shall collaborate with relevant organizations, NGOs, and government agencies working on SEA/SH prevention and response to share best practices, enhance collective efforts, and support survivors.

7.2. Response Mechanisms

7.2.1. Focal Points and Roles under the GRM

- **Community Level: *Community Grievance Redress Committee (CGRC)***

As described in Section 7, In order to cater to the unique characteristics of fishing communities in Liberia, which are often of a hybrid nature, encompassing Kru and Fanti Fishing Communities, the LSMFP established Community Grievance Redress Committee (CGRC) within intervention communities to address grievances arising from the project. Given its designated role, it is anticipated that GBV-SEA/SH project related complaints will be reported to the CGRC. In such instances, the committee assumes the responsibility of receiving the case and promptly referring it to the GBV SP, who serves as the primary contact for GBV-SEA/SH cases within the project.

The role of the FGRC will primarily be referral of the complaint to the GBV service providers:

1. **PIU/National level: Social Development Specialist**

The Social Development Specialist shall be responsible to follow up and ensure compliance to the effective implementation of the Prevention and Response Implementation Framework:

- :
1. Nafaa, through the Social Development Specialist, will promptly notify the WB of all GBV-SEA/SH complaints.
 2. The Social Development Specialist will monitor and track the status of cases with the GBV SP until their resolution. The GBV SP is not obligated to disclose case data to the Specialist or any other party without the survivor's explicit consent. However, the GBV SP will share updates on the case's status.
 3. The Social Development Specialist will conduct periodic assessments of the GBV SP to ensure alignment with the WB Good Practice Note as well as compliance with the LSMFP Prevention and Response Implementation Framework.

GBV Service Providers (SPs)

GBV Service Providers play a crucial role in the LSMF project's efforts. They are tasked with supporting survivors and coordinating the resolution mechanism through a survivor-centered approach. The project will hire a non-governmental organization GBV service provider in the intervention counties for this purpose, The GBV SP will collaborate with the Ministry of Gender Children Social Protection County Gender offices . Furthermore, the project will map and integrate GBV Services Providers within the project area into the Projects GRM . These providers encompass legal, health, psychological/mental health; judicial services, social welfare, NGOs, and shelters, both state and non-state agencies that are available, accessible, and can serve as entry points and referral agencies for cases. To fulfill their roles effectively, these GBV SPs will:

1. Serve as primary entry points for survivors to report GBV-SEA/SH project-related incidents, subsequently
2. With survivor's consent , report grievances to Nafaa , who will then inform WB immediately
3. Act as referral agencies for survivors, working in coordination with the GRM through its GBV-SEA/SH Focal Person and the Social Development Specialist.
4. Implement their own case management support systems for processing GBV-SEA-SH cases, enabling efficient resolution, including interagency referrals.
5. Provide the necessary services required to support survivors, encompassing legal, health, psychological, and social welfare assistance.
6. Prioritize and maintain confidentiality, safety, and security of survivors, adhering to best practices and ensuring a survivor-centered approach throughout the processes. Consent of the survivor will be sought when sharing personal data with other agencies.
7. Collaborate with the PIU Social Development Specialist in coordinating the resolution mechanism and providing updates on case status
8. Promptly inform the GBV-SEA/SH Focal Person and the Social Development Specialist when a case has been resolved so that it can be recorded by the GRM and closed.
9. Conduct outreach and awareness on GBV-SEA/SH issues

Contractors, Sub-Contractors, Grantee, Consultants

As a requisite All contractors, including consultants, grantees, subcontractors, suppliers, and their respective employees and workers, hired for services on the LSMF Project as part of the of C-ESMP, are obligated to adhere to the principles outlined for GBV-SEA/SH prevention and response measures. Additionally they are required to develop SEA/SH Accountability and Response Framework: The to this end, these entities shall:

1. Participate in the procurement and bidding processes with the understanding that they must meet the requirements for mitigating, preventing, and responding to GBV-SEA/SH at their respective firm levels.
2. Develop or adopt their CoCs and policies and ensure that their workforce and employees endorse and adhere to these documents.

3. Conduct sensitization and training sessions for their management and workers on GBV-SEA/SH and ensure compliance with the CoCs and policies.
4. Commit to participating in the LSMF Project's grievance mechanism, which serves as the primary point for reporting GBV-SEA/SH cases.
5. Assign dedicated personnel within their organizations (internal grievance/resolution mechanism) to address complaints, including investigating, mediating, and applying sanctions where necessary.
6. Provide training to their dedicated personnel on how to conduct fair and appropriate investigations in GBV-SEA/SH cases.
7. Collaborate with any GBV Services Provider that the LSMP Project has requested to offer support to survivors during the handling of matters at the contractor level.
8. Investigate reported cases and apply suitable sanctions to perpetrators in accordance with the Contractor's CoC and policy and procedures, ensuring that these decisions align with Liberia's legal frameworks.
9. Prioritize the protection, safety, and confidentiality of survivors in all their processes.
10. Ensure a fair hearing of cases involving alleged perpetrators in their efforts to determine the accuracy of the allegations.
11. Report all GBV-SEA/SH complaints to Nafaa, will promptly notify the WB of all GBV-SEA/SH complaints
12. Provide monthly reports to the Supervising Engineer on the status of the implementation of the project's GBV-SEA/SH prevention and response requirements.

3.2.2. Receiving and Recording GBV-SEA/SH Cases

The LSMPF GBV/SEA-SH system will receive cases directly from a survivor (or complainant, especially if a minor is involved), primarily through the GBV SP , or via various reporting channels a dedicated hotline, an SMS/WhatsApp line and email

Other actors are within the project such as the Social Development Specialist, and designated GBV-SEA/SH focal points within the Contractors, Sub-Contractors/Grantees, and Consultants' internal structures, the *Community Grievance Redress Committee (CGRC)* will receive GBV-SEA/SH complaints, , however they will be trained to refer the cases to the GBV SP.

The information collected at this stage will include:

- i. The nature of the complaint
- ii. Information about whether the perpetrator had any association with the project

- iii. Age and gender of the survivor, if available
- iv. Information on whether the survivor was referred to service

The information in the GRM must be confidential—especially when related to the identity of the complainant. For SEA/SH, the GRM will primarily serve to refer complainants to the GBV service provider and record resolution of the complaint.

Upon recording of the case in the GRM, the GBV SP will immediately inform Naafa who will inform WB in keeping with reporting protocol per WB Environmental and Social Incident Response Toolkit (ESIRT).

3.2.3. Referral within the GRM

Upon logging the grievance and with the survivor's consent, the following steps will be taken:

1. The case will be referred to the project's designated GBV service provider (GBV SP) with the survivor's consent, where it will be addressed through their processes. Collaboration with other agencies in the national response system (legal, psycho-social, health, judicial, shelters, etc.) may also be considered.
2. The case may be referred to the contractor/employer of the alleged perpetrator for resolution through the employer's internal resolution system.
3. If the survivor expresses a preference for another GBV service provider whose information is available on the GRM referral mechanism, the survivor may receive the relevant services from that provider while the internal resolution mechanism of the perpetrator's employer is addressing the matter.

In accordance with a survivor-centered approach, the survivor will have the autonomy to access services based on their preferences. The survivor will receive comprehensive information about all available services and will be provided with support to make an informed decision regarding their course of action.

3.2.4. Assessment of Grievances

Upon receipt and recording of complaint the GBV SP The GBV Service Provider will process of the complaint, assessing further to ascertain whether as a project-related case, the alleged perpetrator is connected to a contractor on the project; or whether it is a case originating from any of the adjoining Project communities or work sites.

1. Submissions will be classified into two categories: acceptable and unacceptable. Unacceptable submissions encompass those that do not align with the Project's scope, such as service requests, general inquiries, or any other forms of submissions not provided by the project. Acceptable complaints, on the other hand, include any submissions falling within the Project's scope, which WB, NaFaa and, its contractors, subcontractors, grantees, consultant, are accountable for. These may involve violations of or breaches in the code of conduct and Liberia's SGBV legislation. They pertain to specific grievances from individuals adversely affected by the project, and where project personnel, implementing partners, or contractors are implicated. For unacceptable grievances, the GBV SP will inform the complainant within a maximum of ten days from the initial receipt of the complaint. Actions to resolve the complaint will be proposed, and agreement on the response will be sought with the complainant.
2. As best practice , any survivor reporting GBV through a reporting mechanism in a World Bank-financed IPF should receive care regardless of whether the perpetrator is known to be associated with the project or not.
3. The scope of GBV-SEA/SH complaints includes NaFAA staff, implementing partners, and contractors, sub-contractors , consultants, grantees, laborers, volunteers and project affected people. These complaints are applicable both during and outside normal working hours. GBV-SEA/SH acts are strictly prohibited, whether they occur within the project premises and sites or outside, including social events, work-related field trips, and training sessions sponsored by the project.
4. The GBV Service Provider will follow the following criteria to assess and verify eligibility:
 - i. The complaint is project-related; and
 - ii. The complaint is filed by individual(s) and/or communities affected by the Project, or their authorized representative;
 - iii. The complaint alleges that the Project has caused or will cause harm to the individual(s) and or communities submitting the complaint.

Upon completion of the assessment a response on the next steps will be communicated to the survivor. The response shall include the following elements:

- i. Acceptance or rejection of the complaint,
- ii. Reasons for acceptance or rejection
- iii. If rejected , referral to the appropriate services through the county referral pathway with consent of the survivor
- iv. If accepted, the applicable resolution mechanism will apply

3.2.5. Resolution Mechanism

The GBV SP proceeds with accountability proceedings, always respecting the survivor's wishes.

If the allegations are considered to be credible, the subject of the complaint should be notified verbally and in written. If the alleged perpetrator is a personnel/employee/volunteer of a contractor/sub-contractor/ grantee / consultant/NaFaa the entity shall inform the subject of the complaint.

If the survivor opts not to pursue an official complaint with the employer, the case is closed, and the survivor receives all relevant support services.

In cases where the survivor chooses to proceed with the complaint, the following steps are followed:

1. The case is referred to the contractor/employer of the alleged perpetrator for resolution through the employer's internal grievance resolution system, as mandated by the procurement process. This internal system is equipped with mechanisms to address complaints, including investigation, mediation, referral, and the application of sanctions as deemed necessary.
2. A survivor's representative/advocate from the GBV service provider may participate in the resolution mechanism. This participation may include referral to law enforcement if required by law or requested by the survivor. The survivor must provide explicit consent for the GBV service provider's representative to act on their behalf in this mechanism.
3. Throughout the investigation process, every effort will be made to maintain confidentiality and safety of all parties involved. Identifying information relating to all individuals involved in a complaint will only be made available to the investigating officers, panel, and essential personnel on a need-to know basis. This information will not be shared further without obtaining the informed consent of those involved, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so. Non-identifying information may be shared as per reporting requirements. All employees and related personnel involved in the complaints process will be expected to maintain confidentiality, and any breach of confidentiality especially when resulting in retaliation or retribution against one of the parties will result in disciplinary action up to and including termination of employment.
4. Upon initial findings, the internal resolution mechanism will assess and implement temporary sanctions and disciplinary measures while investigations are ongoing. These temporary actions may encompass suspension, administrative leave with or without pay, or restricted access to assets and benefits.
5. After the investigation is conducted and concluded, the appropriate party who employs the perpetrator takes the agreed disciplinary action in accordance with Liberia's SGBV legislation, the employment contract and the CoC. The sanctions and disciplinary measures for any instances of GBV-SEA/SH may include, but are not limited to, verbal or written warnings, adverse performance evaluations, wage reductions, transfer, demotion, suspension, administrative leave, dismissal, or referral to the criminal justice system for prosecution. It is crucial to emphasize that the decision to involve law enforcement in criminal action always rests with the survivor.

6. Upon completion of the field investigation, the GBV Service Provider will inform Nafaa through the Social Development Specialist of the case resolution status. The Social Development Specialist (SDS) will monitor and track cases throughout the resolution process. The SDS is responsible for documenting the cases as resolved and inform WB of the case status.

3.2.6. Timeframe for Resolving and Closing a Case

To ensure the well-being of survivors and prompt resolution, it is imperative that complaints are handled with care. Urgent intervention and investigation are required, and action should ideally be initiated within 12 to 48 hours. For complaints that necessitate further assessment, designated staff of the internal resolution mechanism will engage with the complainant via a phone call or formal meeting to gather additional information. Based on this, within 14 days from the initial receipt of the grievance, proposed actions for resolving the complaint will be provided, and agreement on the response will be sought with the complainant. However, if for any reason the 14-day timeframe cannot be met, an explanation will be provided to the survivor outlining the reasons for the delay and a revised timeline. The GBV SP will ensure that the case is recorded in the GRM system.

1.1. The National Referral Pathway

The main service providers involved in addressing Sexual and Gender-Based Violence (SGBV) in Liberia are diverse and collectively play a crucial role in providing support, assistance, and protection to SGBV survivors. Survivors have the option to report to any of these services independently or through other individuals or entities such as schools, family members, or workplaces. All listed service providers are trained to offer services within their mandate, refer survivors appropriately, and assess their needs. Here are the main service providers:

- Ministry of Gender, Children, and Social Protection: This ministry is responsible for formulating policies and implementing programs related to gender issues, including SGBV. They provide psychosocial support and other direct assistance to survivors.
- SGBV Crimes Unit: A specialized unit within the Liberia National Police that focuses on investigating and prosecuting SGBV cases.
- Ministry of Health including the SGBV One Stop Centers: These specialized centers offer comprehensive services to SGBV survivors, including medical, legal, and psychosocial support. The Ministry of Health, overall, provides medical services and support to SGBV survivors through hospitals and healthcare facilities.
- Ministry of Justice: This ministry is involved in the prosecution of SGBV cases and provides legal support to survivors.
- Liberia National Police/Women and Children Protection Section: They handle investigations, refer survivors to appropriate services, and support survivors through the formal justice system.

- NGOs and INGOs focused on gender and women's rights: These organizations are instrumental in providing shelter, counseling, healthcare, and legal assistance to SGBV survivors. As recommended in the action plan, a comprehensive mapping of service providers will be conducted by the LSMFP.
- Safe Homes: Temporary shelters that offer safety and protection to survivors.
- Community-Based Protection Networks: These networks are often established by NGOs and serve as first responders in communities. The primary role includes providing basic support such as psychosocial support and referral to available services.
- Media: Elevate survivor voices and support advocacy

The field consultations brought to light certain limitations in the availability and functionality of services related to addressing Sexual and Gender-Based Violence (SGBV) in the counties. Not all of the listed services are readily accessible in all areas. For instance, in Sinoe County, the Safe Home is currently non-functional, and in Grand Bassa County, the number of CSOs providing direct support has significantly reduced. The active CSOs, such as Women's Rights Watch, primarily focus on advocacy and raising awareness, with limited resources for providing direct support, such as psychosocial assistance.

Additionally, the County-based Ministry of Gender offices reported facing challenges due to limited or no funding and logistical support, hindering their ability to respond effectively to SGBV cases and conduct proper follow-ups. Considering these challenges, it is crucial for the LSMFP to take these realities into consideration and ensure that cases referred to these structures, which may be project-related, receive adequate support to achieve satisfactory resolutions.

The LSMFP should aim to work collaboratively with relevant stakeholders to address the existing gaps in service provision and enhance the capacity of service providers in the counties. By providing adequate funding, logistical support, and technical assistance, the project can contribute to strengthening the response to SGBV cases in the areas where services are limited or facing challenges. Emphasizing the importance of sustained support for survivors and ensuring effective coordination among service providers can lead to better outcomes in the fight against SGBV and the promotion of a safer and more supportive environment for survivors.

Please see Annex 2 for the County Specific GBV referral pathway for each of the LSMFP Intervention County.

1.2. Roles and Responsibilities of Actors

Level	Grievance Committee	Redress role
Community	<i>Community Grievance Redress Committee (CGRC):</i>	<ul style="list-style-type: none"> • Receive complaints and refer to the GBV SP
	GBV Service Provider	<ul style="list-style-type: none"> • First point of entry for GBV-SEA/SH complaints • Conduct an initial assessment of grievances to establish the eligibility • Refer acceptable complaints to the appropriate internal resolution mechanism • Refer cases to the formal judicial system with the consent of the survivor • Conduct outreach and education on GBV-SEA/SH issues and the available support mechanisms • Provide the necessary case management services required to support survivors, encompassing legal, health, psychological, and social welfare assistance.

		Promptly inform Nafaa through the the Social Development Specialist when a case has been resolved
Contractors/Sub Contractors/ Grantees	GBV-SEA/SH Focal Persons	<ul style="list-style-type: none"> • Receive grievances and refer to GBV SP • Notify Contractors/Sub Contractors/ Grantees • Conduct awareness and education on GBV-SEA/SH issues and the available support mechanisms
PIU	Social Development Specialist	<ul style="list-style-type: none"> • Follow up on complaints with the GBV SP Notify the WB of GBV-SEA/SH grievances • Monitor, track, and following up on cases up to case closure

2. Awareness and Training plan for addressing SEA/SH and GBV risks:

2.1. Publicity and Awareness

In order to ensure effective reporting of grievances and raise awareness about the zero tolerance policy for GBV-SEA/SH, the project will implement a comprehensive publicity strategy. This strategy will target various stakeholders, including locals, project beneficiaries, and contractors working within the project's implementation areas. The following channels will be utilized for reporting grievances and disseminating information:

1. Grievance Reporting and Management (FGRM): The project will establish clear channels for reporting grievances related to GBV/SH and SEA through the designated FGRM. These channels will be widely publicized, ensuring that individuals feel comfortable and confident in reporting any incidents.

2. Awareness Campaigns: The project will conduct awareness campaigns to emphasize the importance of the zero tolerance policy. These campaigns will be tailored to different target groups, utilizing various communication channels such as community meetings, workshops, posters, brochures, and audiovisual materials.

To achieve this, a communication plan with relevant GBV-SEA/SH messaging is recommended for the FGRM to raise awareness among stakeholders:

- Production of informative content through brochures, posters, and other educational materials to educate stakeholders about the GBV-SEA-SH GRM and how to access necessary information
- Utilization of radio programs to complement information and education materials, including translating content into local languages
- Conducting community meetings and public fora for further sensitization
- Incorporating gender-specific awareness education content on understanding GBV, sexual harassment, and SEA, will help to avoid reinforcing gender stereotypes, and emphasizing the importance of reporting without fear
- Collaborating with gender-sensitive institutions to produce content and messages promoting conflict sensitivity and management training for both men and women, discouraging gender-based violence.

Implementation of the recommended measures will enhance the effectiveness of reporting SEA/SH and GBV incidents through the Grievance Mechanism. It will ensure standardized reporting, clear referral pathways, and increased awareness among stakeholders, leading to improved accountability, transparency, and support for survivors.

2.2. Training and Capacity Building:

To ensure that the Liberia Sustainable Management of Fisheries Project (LSMFP) team is equipped to handle GBV/SH and SEA cases effectively, it is essential to provide comprehensive training and capacity building. The following topics will be covered in the training:

1. Definition , Types , Causes , Contributing Factors and Consequences of GBV-SEA/SH
2. GBV Stress and Trauma Sensitive Approach: SGBV survivors often experience significant stress and trauma as a result of their experiences. To effectively support and address their needs, adopting a stress and trauma-sensitive approach is essential. This approach recognizes the impact of trauma on survivors and aims to create a safe and supportive environment that promotes healing and resilience. Participants will be trained on the practical steps to implementing the approach.

3. Preventing and Mitigation Mechanisms: Participants will be trained on identifying and responding to GBV-SEA/SH incidents and complaints. They will learn about proactive measures that can be taken to minimize the risk of such incidents occurring during project implementation.
4. Witness Protection: The training will address the importance of safeguarding witnesses and providing them with the necessary support and protection throughout the reporting and investigation process.
5. Confidentiality: Participants will be educated on the significance of maintaining strict confidentiality while handling GBV/SH and SEA cases. This includes ensuring the privacy of victims and treating their information with the utmost sensitivity.
6. The National SGBV Referral Pathway: The training will highlight the roles and responsibilities of relevant agencies, such as the Women and Children Protection section of the Liberia National Police and the Ministry of Gender, Children Social Protection. It will emphasize the importance of collaboration and coordination among these agencies in addressing GBV/SH and SEA. Participants will be familiarized with referral pathways to ensure that survivors receive appropriate support and access to relevant services. This will involve understanding the steps involved in referring cases to specialized service providers and agencies.

To facilitate this training and build the necessary capacity, the LSMFP project will engage a gender-based organization with expertise in GBV-SEA/SH . This organization will provide comprehensive training for all stakeholders involved in the project across its implementation areas. The training will enable participants to understand the dynamics of GBV/SH and SEA, recognize their impact, and adopt strategies to prevent and respond to such incidents effectively.

The training plan highlight types of participants and frequency of training is provided for in the action plan.