



Risks of SEA/H and Mitigation Measures in World Bank COVID-19 Fast Tracks

Introduction

The Care and Protection of Children (CPC) Learning Network, in collaboration with the Bank Information Center (BIC), conducted an analysis of the first wave of World Bank COVID-19 Fast Track Facility projects (Fast Track projects), which revealed a number of trends, gaps, and opportunities for better understanding and addressing the unique sexual exploitation, abuse, and harassment (SEA/H) related risks that children face.

In March 2020, [the World Bank Group committed to distributing up to \\$160 billion towards COVID-19 response over a period of 15 months](#). The “first wave” of 75 COVID-19 Fast Track projects that were approved [between April and September 2020 totaled around \\$43 billion](#) and covered a large geographic and thematic range, including health, education, and social protection. Over one-third (28) of the projects were based in Sub-Saharan Africa, with smaller amounts dedicated to Europe and Central Asia, East Asia and the Pacific, Latin America and the Caribbean, South Asia, and the Middle East and North Africa. Nearly all of the projects were from the Health, Nutrition, and Population practice area.

[Compounding factors related to the COVID-19 pandemic, including health and psychosocial risks, disrupted social networks, economic and](#)

[psychosocial impacts on families, loss of learning and livelihood opportunities, movement restrictions, quarantine and isolation requirements, and reduced access to services place children at increased risk of SEA/H](#). Thus, it is essential for all COVID-19 projects to account for risks of child SEA/H and implement appropriate risk mitigation and response provisions. We offer a brief overview of these findings and suggest six concrete steps the World Bank can take in future project design to help protect children from SEA/H.

Brief Overview of Analysis

CPC and BIC conducted the analysis based on a desk review of available public documentation on 75 COVID-19 Fast Track projects, including the Public Information Document (PID) for all projects and Project Appraisal Documents (PAD), Environmental and Social Review Summaries (ESRS), Environmental and Social Commitment Plans (ESCP), and Environmental and Social Management Frameworks (ESMF), where available.

Overall, the analysis revealed inconsistent progress towards addressing SEA/H across projects, and several areas for strengthening. Most projects included at least one reference to addressing SEA/H issues, and many recognized that there was a risk

of SEA/H related to the project, including against children. However, most projects did not consider SEA/H risks and mitigation measures or attend to the unique vulnerabilities and needs of children.

Based on this analysis, we identified some key themes and good practices in country projects, which should be applied to the design and implementation of projects moving forward.

Good Practice Table

Following are examples of and not comprehensive COVID-19 Fast Track projects that contained elements that can be considered good practices for considering and designing ways to reduce and address SEA/H related to the project. Please note that this list is not exhaustive.

Good Practice	Example of COVID-19 Fast Track Project
Inclusion of SEA/H across all project documentation, including PAD, ESRS, and ESCP	Burundi - COVID19 Preparedness and Response Project
Inclusion of dedicated sections in project documentation for discussion of SEA/H, especially the PAD, amending the template if necessary	Côte d'Ivoire - COVID-19 Strategic Preparedness and Response Nigeria - COVID-19 Preparedness and Response Project Republic Of Congo Lisungi Emergency COVID-19 Response Project
Inclusion of targets, indicators, and means of verification on SEA/H in PAD	Nigeria - COVID-19 Preparedness and Response Project Somalia - Crisis Recovery Project
Including addressing all forms of GBV as a component of the project, which will lead to a dedicated budget to addressing GBV within the overall project, including SEA/H	Uganda - COVID-19 Emergency Education Response Project

Carrying out a gendered analysis of the project and context can lead to better SEA/H risk identification and mitigation measures	Nigeria - COVID-19 Preparedness and Response Project
Including the relevant Ministry or Ministries responsible for gender and children as a key stakeholder	Uganda - COVID-19 Emergency Education Response Project
Explicitly including a Code of Conduct as a requirement for all staff and contractors on the project	Guinea - COVID-19 Preparedness and Response Project Guatemala - COVID-19 Response
Planning capacity building and training on gender, GBV, VAC, and SEA/H	Bhutan - COVID-19 Emergency Response and Health Systems Preparedness Project Maldives - COVID-19 Emergency Response and Health Systems Preparedness Project Yemen - COVID-19 Response Project
Dedicated funding for gender and vulnerability assessments in the context of COVID to be used to inform other components of the project	Pakistan - Response, Recovery and Resilience in Education Project (COVID19 RRREP)
Use of available resources, evidence, tools, and guidance on addressing GBV and VAC, including SEA/H	Burkina Faso - COVID-19 Crisis-Response Development Policy Financing Myanmar - COVID-19 Emergency Response Project Sri Lanka - COVID-19 Emergency Response and Health Systems Preparedness Project
Commitment to identify a Safeguarding Focal Point and assigning accountability within the management of the project	Djibouti - COVID-19 Response

Acknowledgement that SEA/H risk identification and mitigation is an ongoing process throughout implementation	Djibouti - COVID-19 Response Yemen - COVID-19 Response Project
Referencing the SEA/H measures that will be put in place with contractor and procurement processes	Burkina Faso - COVID-19 Crisis-Response Development Policy Financing
Committing to developing a SEA/H Prevention and Response Action Plan, including an Accountability and Response Framework	Cabo Verde - COVID-19 Emergency Response Project Somalia - Crisis Recovery Project
Addressing the unique risk of SEA by security forces involved in COVID response	Liberia - COVID-19 Emergency Response Project Malawi COVID-19 Emergency Response and Health Systems Preparedness Project
Commitment to hire specialists in SEA/H and a timeline for when they will be hired	Central African Republic - COVID-19 Preparedness and Response Project Somalia - Crisis Recovery Project
Good practice of community consultations in single sex groups to gather information about SEA/H risks, including measures that will be taken in a COVID context	Central African Republic - COVID-19 Preparedness and Response Project
Use of detailed language to describe the measures that will be taken to address SEA/H	Liberia - COVID-19 Emergency Response Project Malawi COVID-19 Emergency Response and Health Systems Preparedness Project Uganda - COVID-19 Emergency Education Response Project
Committing to outreach and engagement with community members to assess GBV and SEA/H throughout the project	Yemen - COVID-19 Response Project

Involvement of civil society, especially in GBV service provision and management of GRM	Egypt - COVID-19 Emergency Response
Explicitly referring to a survivor-centered approach	Nigeria - COVID-19 Preparedness and Response Project Somalia - Crisis Recovery Project
Inclusion of a comprehensive list of mitigation actions that will be taken to reduce the risk of SEA/H	Liberia - COVID-19 Emergency Response Project
Dedicated funding for GBV service providers to support the adaptation of their services to a COVID context	Albania - Emergency COVID-19 Response Project
Committing to strengthening the GM to improve capacity to effectively manage reports of SEA/H	Côte d'Ivoire - COVID-19 Strategic Preparedness and Response Serbia - Emergency COVID-19 Response Project

Recommendations

We call on the World Bank to adopt the following six recommendations in COVID-19 project design and implementation to help strengthen efforts to prevent, mitigate, and respond to child SEA/H:

1. Build on existing good practices identified in COVID-19 Fast Track projects and available tools and guidance on SEA/H prevention

It is promising that many COVID-19 projects included at least one reference to addressing SEA/H issues, including against children. Noteworthy projects that considered some of the unique risks to children within the project (such as SEA/H, gender-based violence (GBV), and other child protection concerns in the context of COVID-19) included those in [Uganda](#), [Somalia](#), [Indonesia](#), [Guatemala](#) and [Cambodia](#). Projects in [Guinea](#) and [Guatemala](#) explicitly mentioned and included a Code of Conduct as a requirement for all project staff and contractors. The World Bank should build on these and other good practices so that every project identifies the risks of child SEA/H and the unique impacts faced by children; includes relevant technical expertise and funding; and considers appropriate implementation, monitoring,

and response provisions to address these risks.

In addition, government bodies, civil society organizations, international NGOs, UN agencies, and academics representing global, regional, country, and local perspectives have published a wealth of data, tools, reports, and guidance on gender, GBV, violence against children (VAC), and SEA/H. These include resources and guidance produced by the World Bank¹. Of the 75 reviewed projects, three examples ([Sri Lanka](#), [Burundi](#), and [Myanmar](#)) referenced external reports, guidance, and analysis on SEA/H issues. These resources can help to inform effective project design with accompanying guidance on prevention and mitigation, implementation, and monitoring efforts.

2. Address the unique needs and vulnerabilities of children, including SEA/H

Children have unique needs and face particular risks that require special attention. These unique risks include the risk of SEA/H, requiring child-sensitive approaches to preventing and mitigating this harm. COVID-19 projects in [Mongolia](#) and [Myanmar](#) included a gendered analysis without acknowledging the specific risks to children. Projects in [Cambodia](#), [Guatemala](#), [Indonesia](#), [Somalia](#), and [Uganda](#) included some reference to the unique needs of children. However, the most common considerations of risks to children revolved around access to education or child labor, without reference to SEA/H risks. Even in projects where impacts of school closures on children were a major component of the project, as in [Ghana](#) and [Pakistan](#), documents did not mention the specific risks of child SEA/H issues. Future COVID-19 response projects must clearly account for the specific needs of children, and ensure appropriate measures to prevent, mitigate, and respond to the unique risks they face, including SEA/H, by using a survivor-centered, child-sensitive approach.

3. Use clear, consistent, and appropriate terminology related to SEA/H across projects

Consistent use of accepted terminology can

¹ For example: World Bank (2017) *Working Together to Prevent Sexual Exploitation and Abuse: Recommendations for World Bank Investment Projects* <http://documents1.worldbank.org/curated/en/482251502095751999/pdf/117972-WP-PUBLIC-recommendations.pdf>; World Bank (2020) *Good Practice Note – Addressing SEA/SH in Investment Project Financing Involving Major Civil Works* <http://pubdocs.worldbank.org/en/741681582580194727/ESF-Good-Practice-Note-on-GBV-in-Major-Civil-Works-v2.pdf>; and World Bank (2020) *Interim Technical Note on Grievance Mechanisms for Sexual Exploitation and Abuse & Sexual Harassment in World Bank-financed Projects*

contribute to more effective and appropriate risk assessments, prevention, mitigation, and response mechanisms for SEA/H. The analysis noted that terms of SEA/H, GBV, and VAC were often used interchangeably across and within projects, without evidence of understanding of the relationship between these terms. COVID-19 projects in [Fiji](#), [Jordan](#), [Marshall Islands](#), and [Pakistan](#) conceptualized SEA as a form of GBV in line with the World Bank's [Good Practice Note – Addressing SEA/SH in Investment Project Financing Involving Major Civil Works](#) (GPN). It is important to note that there were no examples in projects where SEA was considered a form of VAC. Some projects, including [Benin](#) and [Indonesia](#), reference SEA but not SH. Additionally, the [Fiji](#) project referred to “preventing” SEA, when in fact the project focused on risk mitigation rather than prevention.

4. Systematically consider SEA/H issues in project design and project documents and include SEA/H indicators when evaluating the success of a project

Despite reference to SEA/H issues, very few project documents outlined the specific SEA/H risks involved in the projects themselves, including identifying potential perpetrators and groups most vulnerable to exploitation and abuse, such as children. The projects in the [Central African Republic](#) and [Lesotho](#) did include contextual details of SEA/H issues. Although the projects in [Jordan](#), [Maldives](#), and [Pakistan](#) demonstrated an analysis of SEA/H risks, this was not accompanied by a strong mitigation plan. Additionally, very few projects describe what measures will be taken when cases of SEA/H are identified or disclosed. Notably, the projects in [Djibouti](#) and [Yemen](#) referenced monitoring risks of SEA/H throughout project implementation.

Monitoring and evaluation of SEA/H in project design is also critical in terms of mitigation and response. Examples of the use of World Bank Grievance Redress Mechanisms (GRM) to address SEA/SH in project documents are rare. Even when GRMs are in place, the Bank should strengthen these so that they are child-sensitive, survivor-centered, and accessible. The [Serbia](#) project commits to strengthening the GRM to manage reports of SEA/H issues, but does not reference children. [Nigeria](#) is the only project that includes a specific indicator around SEA/H issues — ‘number of states with SEA/H gender platforms for reporting complaints according to national protocol.’ COVID-19 Fast Track projects should include indicators to monitor and evaluate the project's capacity to manage SEA/H risks, and

the World Bank should link performance on these indicators to the overall success of the project. One option is to extend the recommendations of the GPN beyond projects with major civil works to COVID fast track projects and use the sample indicators.

5. Engage and work collaboratively with stakeholders, including civil society

Engaging and collaborating with civil society working with communities (including women's rights organizations, child rights organizations, labor unions, and health care and education workers) can help to strengthen project impacts and decrease vulnerabilities to populations that face unique risks to SEA/SH, such as children. The project in [Egypt](#) referred to engagement with civil society partners that represent the needs of children. All consultations should take place using best practices and guidance to reduce the potential for harm, while ensuring that confidential reporting, whistleblowing protection, and referrals to support and services are available for those participating in consultations.

6. Adapt project documentation to better reflect SEA/SH risk analysis and mitigating actions and make it publicly available and timely

World Bank-funded projects, including COVID-19 Fast Track projects, are required to use the same project documentation regardless of budget, presenting both opportunities and challenges. The analysis revealed that many of the ESCPs included the identical phrase "prevent and respond to sexual exploitation and abuse, and sexual harassment" without any additional information about how they would be preventing and responding in the specific context of that project. Task Team Leaders should work to develop project documents such as Environmental and Social Impact Assessments (ESIAs) that look at the unique impacts of particular projects on children and Environmental and Social Engagement Plans (ESEPs) should include contextual measures to respond to SEA/H issues. Such analysis should then include specific actions to be taken to prevent and respond to SEA/H in these settings. Additionally, COVID-19 Fast Track project templates should be updated to more comprehensively consider SEA/H risks and response measures to aid in project delivery and response. Contextual analysis, including stakeholder engagement, is vital for effective project design and preventing and responding to SEA/H. At the time of review, not all project documents were publicly available, and among those that were publicly available some committed to addressing SEA/H concerns in future documents or phases

of the project. The Bank needs to prepare these documents on a timely basis and make them publicly available in current and future COVID-19 projects for transparency and monitoring purposes.

Conclusion

Taken together, these steps can help to create an enabling environment for including measures to prevent, mitigate, and respond to child SEA/H in the design, implementation, and monitoring of COVID-19 Fast Track projects. We hope to see the World Bank improve its project design and implementation to help protect the world's most marginalized children amidst the response to the COVID-19 pandemic.

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