



Addressing SEA/H in Human Development Operations

In September 2022, the Bank published a Good Practice Note (GPN) on [Addressing Sexual Exploitation and Abuse and Sexual Harassment in Human Development Operations](#). This GPN represents a significant expansion of the Bank's work on preventing Sexual Exploitation Abuse and Harassment (SEA/H) and has the potential to significantly improve the Bank's ability to prevent and respond to SEA/H. It is also notable for its efforts to address intersectionality, looking at child specific SEA/H related risks and also looking at how LGBTQI+ individuals and persons with disability have unique SEA/H related risks. However, it is critical that this GPN is taken seriously by staff at all levels of the Bank and that project level staff prioritize the implementation of all of its guidance across the Human Development (HD) operations. This policy brief explains why this particular GPN is important, offering a summary of its strengths and providing recommendations on aspects that could be improved in practice.

What is new and valuable in this GPN?

Goes beyond large infrastructure projects. The GPN acknowledges that HD operations projects can cause or contribute to causing SEA/H.

Builds upon lessons learned. Following the [Uganda case](#), in October 2016, the World Bank launched a [Global Gender-Based Violence \(GBV\) Task Force](#) to strengthen the institution's efforts to prevent and respond to risks of GBV and SEA/H in Bank-projects and developed an [action plan](#) following the Task Force's [recommendations](#). This effort was initially wholly focused on infrastructure projects; but over time, with the help of civil society organizations (CSOs) advocacy, the Bank recognized the risk of SEA/H in Human Development Projects, thus developing this note.

Spells out the links between HD operations projects, GBV, and SEA/H. The GPN recognizes there are multiple factors and drivers of GBV and SEA/H at individual, relationship, community, institutional, and policy levels that can be exacerbated by the power dynamics introduced by Bank funded projects. This can lead to cases of GBV and SEA/H perpetrated by either project actors (i.e., project workers and civil servants working in connection with the project) or members of the general public against beneficiaries and community members.

Why is this GPN a positive development for children?

Mainstreams children throughout the document and encourages Bank staff to conduct risk assessments that pay particular attention to the unique risks to children.

Calls on Bank staff to pay particular attention to overlapping vulnerabilities that increase risks of SEA/H. Notably, the GPN recognizes that women, children, persons with disabilities, and LGBTQI+ individuals experience additional vulnerabilities that increase their risk of becoming victims of SEA/H in the first place and that this can be exacerbated even more when they overlap (i.e adolescent, trans women with disabilities). Therefore, to allow for a survivor-centered approach, measures to address, prevent, and respond to SEA/H need to take these vulnerabilities into consideration.

Prioritizes the best interests of the child. Guided by article 3 of the Convention on the Rights of the Child, the GPN puts the best interest of the child at the center of the response to child SEA/H and explains how their active participation should define their best interest.

Provides examples of what child SEA/H is as well as tools to assess country and sector risks in practice. It also provides examples of the several ways in which child SEA/H can happen in the context of different HD operations and provides guidance for Task Team Leaders (TTLs) on how to: assess child SEA/H risks; develop strategies to prevent and respond to SEA/H (including but not limited to grievance redress mechanisms -GRMs- and referrals for victims); and better guide the Borrower.

Calls for clear, mandatory, and enforceable prohibitions on SEA/H that can be set forth in different instruments, including but not limited to Codes of Conduct (CoC).

Calls for identifying and mapping GBV service providers to prepare for a survivor-centered response when cases of SEA/H are reported. It recognizes that GBV providers might not be available in some situations and sets forth possible strategies for the Bank to fill this gap when needed.

Acknowledges consultations with children and child rights organizations are essential to identifying SEA/H risks, and discusses how to do this at many points in the GPN and its annexes.

Recognizes the importance of monitoring SEA/H mitigation activities listed in project documents so that these mitigation measures are actually implemented on the ground rather than existing only on paper. Ways to monitor these activities described in the GPN include engaging with stakeholders and utilizing third-party monitors.

Recommends preparing a dedicated SEA/H action plan for projects with a substantial or high SEA/H risk, and an Accountability and Response Framework for all projects to better prevent and respond to SEA/H, including child SEA/H, throughout the project cycle.



How to make out the most of this GPN?

Focus on implementation. The GPN will be useless if it is not properly implemented in practice. Bank staff need to lead by example by communicating to the Borrower the importance of preventing and responding to SEA/H, and consistently monitoring projects to determine whether the Borrower is setting up appropriate measures to prevent and respond to SEA/H on the ground.

Push the boundaries and take the GPN as a starting point, not the endgame. The GPN expressly mentions that it should be considered “as a starting point.” Therefore, the Bank should work to close the gaps where the GPN falls short. In doing so, the Bank should consider the following recommendations:

- **Funding is essential to assess risks and establish safeguarding measures properly.** Improving and building local service providers’ capacity to address child SEA/H requires investing time as well as financial and human resources that need to be budgeted for at the time of project design.

- **Effective safeguarding needs a comprehensive organizational approach.** The responsibility for SEA/H safeguarding cannot rest solely on one individual or department. Rather, the Bank, Borrower and contractor must all embrace their responsibility to prevent and respond to child SEA/H.
- **Meaningful consultations with children should be a primary requirement.** This is independent of their age, gender, sexual orientation, and/or disabilities they may have, particularly when they are the primary beneficiaries of the project. Currently, the GPN says Borrowers “should” consult children to assess and respond to child SEA/H risks and to listen to them in cases of SEA/H actively. However, child voices should be upheld at all times, not only when reacting to cases.
- **Better monitoring requires working with local CSOs.** The Bank and the Borrower should actively engage project beneficiaries and local CSOs with expertise in SEA/H, child rights, LGBTQI+, and disability issues to be able to understand how different individuals are being impacted by project implementation. They should also monitor if prevention and response measures are sufficient and effective in practice.
- **SEA/H action plans should be a requirement for substantial and high risks of SEA/H projects.** If the Bank takes SEA/H prevention seriously, the action plans should be required rather than just recommended. Additionally, these should be developed and disclosed before project approval and have concrete, detailed, and tangible actions to address and respond to SEA/H.

Acknowledge that there is no one-size-fits-all strategy. The Bank should build on lessons learned and best industry practices to address and prevent child SEA/H, and acknowledge that there is no one-size-fits-all strategy when dealing with GBV and SEA/H. Even when this GPN has several examples and tools to implement in practice, the particularities on the ground and/or a specific case might require being creative and going above and beyond to respond to SEA/H in HD operations. Ultimately, the effectiveness of this GPN should be measured in practice, not solely in project design.

Successful management of SEA/H does not mean zero cases. Instead, it means that cases are responsibly, respectfully, and effectively handled with a survivor-centered approach.

Use the GPN to foster cultural change inside the Bank. There should be openness to recognizing what does not work, and utilizing failure as an opportunity to support victims, close gaps in projects, and learn lessons for the future.

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