



# Guidance Note on Gender-Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) for GEF and GCF Projects

## Introduction

This Guidance Note on Gender Based Violence (GBV) and Sexual Exploitation, Abuse and Harassment (SEAH) is intended to assist project teams in identifying risks of GBV and SEAH that may emerge in conservation projects. Further, this note is meant to support decision-making, and to inform planning and implementation of possible mitigation measures to address GBV and SEAH risks in projects identified during project preparation and execution. More specifically, it aims to:

- Establish basic guiding principles for effectively minimizing and mitigating any identified GBV/SEAH risks in projects.
- Provide suggestions, recommendations, and further resources for project teams working on GBV/SEAH related to projects.

This Guidance Note has been developed primarily for the development and implementation of GEF and GCF projects and is being further adapted for WWF projects more broadly.

## Background

All over the world, it is estimated that one in three women and girls experience GBV during her lifetime.<sup>1</sup> A recent study conducted by IUCN, in collaboration with USAID as part of Advancing Gender in the Environment (AGENT), states that forms of GBV (ranging from sexual, physical and psychological violence, to trafficking, sexual harassment, sexual coercion and in some cases rape) can be linked to environmental issues.

Many projects implemented by WWF relate to effective management of protected areas and the landscapes in which they are located through support to law enforcement, patrolling and better management and restoration of landscapes by restricting access to natural resources. These activities can potentially give rise to GBV/SEAH risks where government-employed law enforcement officials/rangers/guards supported by the project may misuse the power of their positions by sexually exploiting women in local communities. This is a particular risk if women are collecting water or natural resources in a protected area. As another example, projects that promote alternative livelihoods, particularly ones that improve women's empowerment and decision making, can often lead to changes in power dynamics within communities and increase the risks of GBV/SEAH toward those empowered women.

GBV and SEAH in the implementation of WWF activities in projects and programs is unacceptable and requires timely, proportional, and appropriate action. WWF recognizes that to achieve biodiversity conservation it is vital to promote gender equality and make every effort to ensure that project activities implemented by WWF respect integrity and human rights and

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<sup>1</sup> World Bank (2019)

mitigate any risk that gives rise to discriminatory and exploitative gender inequalities. WWF does support projects in areas where there is civil war, ethnic conflict, and insurgencies where there are existing GBV/SEAH risks. WWF therefore needs to understand these risks in order to avoid exacerbating local conditions that contribute to GBV/SEAH, which would undermine any conservation outcomes the project may seek to achieve.

## General Principles

This Guidance Note is guided by several key principles, and these are:

### Respect for Human Rights

WWF seeks to support and promote human rights in its work, guided by international standards including the *Universal Declaration of Human Rights* (1948) and other declarations. WWF seeks to advance its mission – a world in which both people and nature thrive – on the fundamental principle that positive outcomes for both people and nature depend on firmly anchoring and integrating human rights into conservation practices. While governments are duty-bearers with the responsibility to respect, protect and fulfil human rights, WWF recognizes that businesses and organizations, including our own, have an important role to play in contributing to respecting and promoting the realization of human rights. Moreover, WWF recognizes Indigenous Peoples and local communities not only as rights holders but also essential partners for successful and inclusive conservation efforts.

### Compliance with WWF’s Environment and Social Safeguards Framework

WWF’s Environment and Social Safeguards Framework (ESSF) reflects WWF’s process for identifying and addressing potential environmental and social risks; for GEF and GCF projects implemented by WWF this is detailed in the Environmental and Social Safeguards Integrated Policies and Procedures (SIPP). WWF’s social policies on indigenous peoples, gender, and human rights buttress our efforts to prevent and address GBV and SEAH within the places where we work.

### Compliance with Applicable Law

In addition to complying with WWF’s ESSF, all projects need to comply with all applicable national and local laws.

Projects should also reflect the UN and other international declarations where they have been ratified by the country or countries where the project is located, such as the UN *Universal Declaration on Human Rights* (1948), and other declarations.

It should be noted that if WWF’s ESSF is more stringent than the applicable national or local laws, WWF projects should follow WWF’s ESSF where possible.

## Scope of the Guidance Note

Programs whose main focus is GBV/SEAH prevention require a sustained investment over a long period of time to achieve impacts in reducing the incidence of GBV/SEAH. Projects implemented by WWF are primarily conservation projects and generally are not designed to contribute to any long-term goal of reducing GBV/SEAH prevalence. Therefore, this Guidance

Note is limited to addressing potential GBV/SEAH risks that arise from WWF implemented activities.

## Definitions

WWF uses the following definitions for GBV<sup>2</sup>, SEA<sup>3</sup>, and Sexual Harassment<sup>4</sup>:

- Gender-Based Violence means any harmful act that is perpetrated against a person's will and that is based on socially ascribed differences between genders, including acts that inflict physical, mental, or sexual harm or suffering; threats of such acts; and coercion and other deprivations of liberty, whether occurring in public or in private life.
- Sexual Exploitation and Abuse means 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; and, specifically in the case of Sexual Abuse, an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- Sexual Harassment means any unwelcome sexual advance, request for sexual favor, or other verbal, non-verbal, or physical conduct of a sexual nature, that interferes with work, is made a condition of employment, or creates an intimidating, hostile, or offensive environment in connection with a [project] Activity, and, for the avoidance of doubt, Sexual Harassment may occur between or amongst persons of different sexes or genders or of the same sex or gender, and may be initiated by any gender or sex.

Manifestations of GBV/SEAH include, but are not limited to<sup>5</sup>:

- Physical violence (such as slapping, kicking, hitting, or the use of weapons);
- Emotional abuse (such as systematic humiliation, controlling behavior, degrading treatment, insults, and threats);
- Sexual violence, which includes any form of non-consensual sexual contact, including rape;
- Early/forced marriage, which is the marriage of an individual against her or his will often occurring before the age of 18, also referred to as child marriage;
- Economic abuse and the denial of resources, services, and opportunities (such as restricting access to financial, health, educational, or other resources with the purpose of controlling or subjugating a person);
- Trafficking and abduction for exploitation; and,
- Inter Personal Violence (IPV) perpetrated by a former or current partner, includes a range of acts of violence.

To understand if an act of violence is an act of GBV/SEAH, one should consider whether the act reflects and/or reinforces unequal power relations between genders<sup>6</sup>. In conservation projects there are various situations where GBV/SEAH can occur. These include male protected area employees in positions of power (e.g. rangers/guards) allowing women or girls to collect resources inside a restricted zone of a protected area in exchange for sex; or sexual violence including rape if they find women inside the protected area. Restricted access to resources in a

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<sup>2</sup> GEF

<sup>3</sup> GEF

<sup>4</sup> GCF

<sup>5</sup> World Bank

<sup>6</sup> GEF

landscape can also result in women and girls having to walk further to other areas to collect food, water or firewood, to partake in agricultural activities or graze livestock which heightens their risk of being subjected to GBV/SEAH.

## GBV/SEAH Perpetrators

For the purposes of this Guidance Note, potential perpetrators of GBV/SEAH can be any individuals associated with the project, including project staff, government park rangers and guards, other park staff, consultants, partner organizations, and contractors.

## Identifying GBV/SEAH Impacts

### *Screening*

For WWF projects, including GEF and GCF projects, under the Standard on Community Health and Security, the project team should identify any potential GBV/SEAH risks by screening proposed project activities using the following questions:

- Is there a risk that the project could pose a greater burden on women by restricting the use, development, and protection of natural resources by women compared with that of men?
- Is there a risk that persons employed by or engaged directly in the project might engage in gender-based violence (including sexual exploitation, sexual abuse, or sexual harassment)?
- Does the project increase the risk of GBV and/or SEAH for women and girls, for example by changing resource use practices?
- Does any mandated training for any individuals associated with the project (including project staff, government park rangers and guards, other park staff, consultants, partner organizations and contractors) cover GBV/SEAH (along with human rights, etc.)?

The identification of GBV/SEAH risks in a project is normally undertaken as part of project preparation and could be conducted during community/stakeholder consultations together with identifying potential risks and screening impacts on vulnerable groups, community health, safety and security, labor and working conditions, gender equality issues, and any other social or environmental risks. Any potential GBV/SEAH risk identified during this stage would be factored into the project's overall social risk, which, in turn, is factored into the overall environmental and social risk associated with a project.

## Assessing GBV/SEAH Risks

### *Stakeholder Engagement*

Under the WWF's Standard on Stakeholder Engagement, all projects are required to develop a gender-responsive Stakeholder Engagement Plan (SEP), which will be implemented, monitored and adapted as needed throughout the life of the project. Where GBV/SEAH risks are identified as a potential risk of project activities, the SEP should include specific GBV/SEAH considerations for how to appropriately conduct consultations. It is important that when "at-risk groups" are identified they be given priority so that the project team can understand existing

GBV/SEAH risks and any trends with the community. All consultations as per the standard should be inclusive and should be continuous and not only limited to project preparation. For example, focus group meetings are important as women may not speak up in front of men on GBV/SEAH. There will also likely be cultural sensitivities that need to be taken into account. Stakeholder consultations should not directly ask about individual GBV/SEAH experiences.

Recognizing the gender power dynamics and social dynamics within a community and how they may inhibit participation, it is key to ensure that spaces are made available for women, men and youth affected by the project to participate in consultations. It is important that the stakeholders be aware, at a minimum, of:

- The purpose, nature and scale of the project.
- The duration of the proposed project activities.
- Potential risks and impacts on local communities, and especially those related to GBV/SEAH.
- The proposed stakeholder engagement process and how stakeholders can provide feedback on the project.
- The channels available to lodge complaints through the project Grievance Redress Mechanism (GRM) and how they will be addressed.

Project teams are advised to consult local CBOs/NGOs or women's groups or other project partners that would help identify GBV/SEAH risks and trends within a community and also to map any services available for responding to GBV/SEAH incidents.

## Safeguards Documents

When screening and consultations identify GBV/SEAH risks, the project team may be required to prepare a detailed **GBV/SEAH Risk Assessment**, which should be done by a GBV/SEAH expert if the safeguards consultant does not have that expertise and should include the types of GBV/SEAH that are present in the community where the project exists and may be exacerbated by the project; including identification of what groups of individuals are most vulnerable to harm; where women and girls feel most unsafe; how the community currently deals with GBV/SEAH incidences; and why GBV/SEAH may be exacerbated by the project<sup>7</sup>.

From the results and recommendations of the GBV/SEAH Risk Assessment, a time bound and budgeted **GBV/SEAH Action Plan**<sup>8</sup> should be developed that contains specific ways that GBV/SEAH risks arising from the project will be addressed as part of project design and implementation. A GBV/SEAH Action Plan will include how the project will put in place the necessary protocols and mechanisms to address the GBV/SEAH risks and how to address any GBV/SEAH incidents that may arise.

The GBV/SEAH Action Plan needs to include specific **arrangements** for the project by which GBV/SEAH risks will be addressed. This includes considerations such as:

- Awareness Raising Strategy, which describes how workers and local communities will be trained and sensitized to GBV/SEAH risks, and responsibilities of the rangers, guards and other project affiliated employees under relevant codes of conduct; and,
- GBV/SEAH Allegation Procedures: How the project will provide information to employees and communities on how to report cases of GBV/SEAH to the GRM and/or other resources like law enforcement.

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<sup>7</sup> World Bank (2019)

<sup>8</sup> World Bank (2019)

- Accountability and Response Framework of how allegations will be addressed and who is responsible for addressing them. The Accountability and Response Framework, should include at minimum:
  - o An accountability section, that contains internal case accountability procedures which should clearly lay out confidentiality requirements for dealing with cases; and,
  - o A response section which contains:
    - Mechanisms to hold accountable alleged perpetrators associated to the project – contractual, employment, and where necessary referral to law enforcement;
    - The GRM process for making relevant and required reporting of GBV/SEAH allegations while maintaining appropriate confidentiality; and,
    - A referral pathway to refer survivors to appropriate support services.

The response section of the ‘Accountability and Response Framework’ in the GBV/SEAH Action Plan should clarify the parties who are empowered to take employment related disciplinary action for violation of relevant codes of conduct – generally this will be the individual’s employer consistent with local labor laws and regulations.

Ultimately the government is responsible for protecting human rights and investigating any abuses.

## Monitoring

All projects must have a monitoring plan which includes reporting on gender and safeguards. Annual supervision missions (more frequently if needed) are required and any GBV/SEAH risks and mitigation measures will be reviewed during the mission. Each project will have access to the WWF GEF/GCF GRM, and a project-level GRM will be developed if the project is a Category B project. These GRMs must be made accessible to all project stakeholder and any GBV/SEAH allegations may be reported through any available GRM system.

Project teams are advised to use third party monitoring and/or community monitoring on an ongoing basis when a GBV/SEAH Action Plan has been developed.

If there are questions, please contact the WWF GEF Agency ([GEFAMU@wwfus.org](mailto:GEFAMU@wwfus.org)) or the WWF GCF Accredited Entity ([WWFGCF@wwfus.org](mailto:WWFGCF@wwfus.org)).