

## SEA/SH Risk Mitigation, Response and Accountability Framework

Dec 2024

Actions	Indicators	Responsibility	Timeline	Budget
<b>A. Institutional Strengthening</b>				
A-1. Establishment of an Anti-Harassment committee to investigate SEA/SH complaints	Notification of A-H Committee with ToRs	PD, SSGI	Anti-Harassment Committee Notified on 16 <sup>th</sup> January 2024 <i>(see Annex-I)</i>	No budget requirement for establishment of committees and preparation of SEA/SH inclusive Code of Conduct for all PIU and District staff.
A-2. Establishment of a Grievance Redressal Committee (GRC) responsive to SEA/SH complaints	Notification of GRC with ToRs	PD, ESS, SSGI	GRC Notified on 15 <sup>th</sup> Nov, 2024 <i>(see Annex-II)</i>	
A-3. Inclusion of clauses for appropriate ethical behaviour, including a zero-tolerance policy towards sexual abuse and harassment in the Code of Conduct signed by all employees	Number of employees at all levels who have signed CoCs	GM Admin & HR, SSGI	On-going	
<b>B. GRM Strengthening</b>				
B-1. Ensure SEA/ SH response mechanisms and protocols are embedded within the main GRM.	No. of sensitive complaints received and resolved (the GRM should be able to handle SEA/SH complaints as per the Protocols mentioned in the GRM)	ESS, SSGI	SEA/SH responsive GRM to be included in the updated SEP by Jan-2025	PKR 1.0 million in line with the project's approved PC-1
B-2. Hiring of female interface agents in the call center well versed in local languages and capable of handling SEA/SH complaints	No. of qualified female interface agents hired	ESS, SSGI	GRM interface agents hired on 1 <sup>st</sup> Sept, 2024 through Call Center Firm	
B-3. Training and capacity building of female call agents to ensure smooth and adequate resolution of GBV, SEA/SH complaints.	Training module inclusive of component on handling SEA/SH complaints (focus on survivor-centered approach)	SSGI Training Officers	The training module was developed with a SEA/SH component in Nov 2024. Training Sessions will be	

Actions	Indicators	Responsibility	Timeline	Budget
	No. of female call agents trained to respond to SEA/SH complaints		initiated in Dec-2024 and will be conducted bi-annually	
<b>C. Awareness Raising and Capacity Building</b>				
C-1. Sensitization and awareness raising on for all SSPA staff on reporting and redressal mechanisms for SEA/SH complaints in line with Federal Law and WB policies	No. of sessions conducted. List of participants and photo-graphic evidence of sessions	SSGI	First round of trainings conducted in July 2024. Refresher trainings on a quarterly basis	Budgeted under 'Capacity Building of staff-C-2'
C-2. Orientation for all SSPA staff and implementing partners on adherence to/implementation of clauses on SEA/SH in CoCs	No. of sessions conducted. List of participants and photo-graphic evidence of sessions	GM, Admin & HR, SSGI	Training to begin in January 2025 and continued on a bi-annual basis	
C-3. IEC materials outlining GRM redressal mechanisms related to reporting SEA/SH will be distributed in local Sindhi language	IEC material for SEA/SH prepared in Sindhi Language. IEC materials distributed to District Offices and participating health facilities	CS, SSGI	IEC Material prepared in September 2024. Periodic distribution will continue till the end of the project.	Budgeted in the overall IEC material budget for the current financial year.
C-4. Implementing visible display signs as part of a Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) policy to help foster a safe environment for women employees and beneficiaries.	Posters highlighting the code of conduct under visibly displayed on each floor of the SSPA head office.  Posters for district offices to be designed in Sindhi and displayed at the district offices.	SSGI	Posters in SSPA head office were put up in December 2023.  Posers for district offices to be displayed in December 2024	

SSGI: Senior Specialist Gender and Inclusion, ESS: Environmental and Social Safeguards Specialist, PD: Project Director, CS: Communications Specialist

## **ANNEX-1: NOTIFICATION OF ANTI-HARASSMENT COMMITTEE**



NO. HR-OFFICER/SSPDSS/6-3/2024/  
GOVERNMENT OF SINDH  
PROJECT MANAGEMENT AND IMPLEMENTATION  
UNIT STRENGTHEN SOCIAL PROTECTION DELIVERY  
SYSTEM SINDH SOCIAL PROTECTION DEPARTMENT

Karachi, dated the 16<sup>th</sup> January, 2024

### **OFFICE ORDER**

With the approval of Competent Authority i.e. Chief Executive Officer Sindh Social Protection Authority, Social Protection Department Government of Sindh, an **Anti-Harassment Committee** is hereby constituted to investigate the matters related to harassment at the workplace in line with the Protection Against Harassment of Women at the Workplace Act (Amendment) 2022 for the Project "Strengthening Social Protection Delivery System in Sindh (SSPDSS)", with the following Composition and Terms of Reference (ToRs):-

#### **COMPOSITION OF COMMITTEE:-**

- |  |                    |
|--|--------------------|
| i. Mr Mehtab Ahmed Bhatti<br>Financial Management Specialist                 | Chairperson        |
| ii. Mr. Rashid Mehmood<br>Senior Social Protection Economist Specialist      | Member             |
| iii. Barrister Maham Durrani<br>Senior Specialist Gender & Social Inclusion. | Member / Secretary |

#### **TERMS OF REFERENCES (TORs):-**

The Inquiry Committee, (1) within three days of receipt of a written complaint, shall—

- communicate to the accused the charges and statement of allegations levelled against him, the formal written receipt of which will be given.
- require the accused within seven days from the day the charge is communicated to him to submit a written defence and on his failure to do so without reasonable cause, the committee shall proceed *ex-parte*; and
- enquire into the charge and may examine such oral or documentary evidence in support of the charge or in defence of the accused as the Committee may consider necessary and each party shall be entitled to cross-examine the witnesses against him.

(2) Subject to the provisions of this Act and any rules made thereunder the Inquiry Committee shall have power to regulate its own procedure for conducting inquiry and for the fixing place and time of its sitting [and, where applicable, apply appropriate child-sensitive procedures.]

(3) The following provisions *inter alia* shall be followed by the Committee in relation to inquiry:

- the statements and other evidence acquired in the inquiry process shall be considered as confidential;
- an officer in an organization; if considered necessary, may be nominated to provide advice and assistance to each party;

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- (c) both parties, the complainant and the accused, shall have the right to be represented or accompanied by a Collective Bargaining Agent representative, a friend or a colleague;
- (d) adverse action shall not be taken against the complainant or the witnesses;
- (e) the Inquiry Committee shall ensure that the employer or accused shall in no case create any hostile environment for the complainant to pressurize her from freely pursuing her complaint; and
- (f) the Inquiry Committee shall give its findings in writing by recording reasons thereof.
- (4) The Inquiry Committee shall submit its findings and recommendations to the CEO-SSPA/PD-SSPDSS within thirty days of the initiation of inquiry. If the Inquiry Committee finds the accused to be guilty it shall recommend to the Competent Authority i.e. CEO-SSPA/PD-SSPDSS for imposing one or more of the penalties [as applicable]:

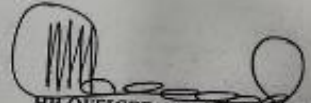
**PROJECT DIRECTOR  
STRENGTHENING SOCIAL PROTECTION  
DELIVERY SYSTEM IN SINDH**

NO. HR/SSPDSS/ 5 /2024/

Karachi, dated the 16<sup>th</sup> January, 2024

A Copy is forwarded for information and necessary action to: -

1. The General Manager (Administration/Finance/Operation), SSPDSS, Karachi.
2. The Financial Management Specialist, SSPDSS, Karachi.
3. The Treasury Officer, Karachi.
4. The Private Secretary to the Secretary, Social Protection Department, Government of Sindh, Karachi.
5. The Private Secretary, to Project Director, / CEO, SSPDSS/ SSPA, Karachi.
6. Official(s) concerned

  
HR OFFICER (SSPDSS) 16/01/2024

## **ANNEX II: NOTIFICATION OF GRC**



NO.HR-Officer/SSPDSS/ 885 /2024  
PMIU-STRENGTHENING SOCIAL PROTECTION  
DELIVERY SYSTEM IN SINDH (SSPDSS)  
SINDH SOCIAL PROTECTION AUTHORITY  
SOCIAL PROTECTION DEPARTMENT  
GOVERNMENT OF SINDH  
Karachi, Dated: Nov 15, 2024

### **NOTIFICATION**

NO.HR-Officer/SSPDSS/885 /2024. With the approval of the Competent Authority i.e. CEO (SSPA) / PD (SSPDSS), A **Grievance Redressal Committee (GRC)** is hereby reconstituted for the project titled "Strengthening Social Protection Delivery System in Sindh" (SSPDSS), Sindh Social Protection Authority (SSPA), Social Protection Department (SPD), Government of Sindh, with the following composition & TORs:

1. Project Director	Chairperson
2. GRM Specialist/ E&S Specialist	Secretary/Member
3. General Manager Operations	Member
4. Sr. Specialist Gender & Social Inclusion	Member
5. Payment Specialist	Member

#### **Terms of References (ToRs):**

- I. The GRC shall ensure that all complaints are resolved and are referred to concerned wings/departments as per the requirements, procedures, and timelines stipulated in the SSPDSS Grievance Redressal Mechanism.
- II. Recommend corrective measures and assist in implementing resolution actions.
- III. Constitute special committees, if required, for the redressal of grievances of an urgent nature and/or for resolving complaints requiring additional procedures.
- IV. Maintain an updated GRM database/Complaints Log and submit reports to the CEO/PD and World Bank for review.
- V. Review the redressal status of different wings/departments of grievances received from stakeholders, ensuring a fair and transparent process.
- VI. Ensure that detailed records of all grievances, investigations, and resolutions are maintained, ensuring documentation is accurate and comprehensive.
- VII. Ensure that the confidentiality and privacy of all complainants is protected, ensuring sensitive information is handled securely.
- VIII. Coordinate with relevant project teams to ensure grievances related to specific project components are addressed effectively and promptly.

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