



**Sexual Exploitation and Abuse
Prevention and Response Action Plan
for the Lebanon Financing Facility
funded**

“BERYT”

**Beirut Housing Rehabilitation and
Cultural and Creative Industries
Recovery Project**

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1. Objective of the Prevention and Response Action Plan

It is strictly prohibited for any United Nations (UN) personnel or partner associated with the “BERYT” project to undertake acts that constitute possible sexual exploitation and abuse (SEA). All UN personnel (including UN-Habitat and UNESCO) must abide by the Secretary-General’s Bulletin ST/SGB/2003/13¹ which strictly sets out the UN’s policy on SEA. All UN personnel must also undertake training and provide certificates of training undertaken upon signing of contracts. UN-Habitat considers any allegations of SEA seriously, and this policy is meant to both inform UN personnel and partners about what constitutes sexual exploitation and abuse, as well as on how this policy will be implemented, including potential disciplinary actions. Annex II contains the Project’s Policy for Protection Against Sexual exploitation and Abuse for implementing partners. This policy is also relevant to activities under component II of the Project, and UNESCO’s implementing partners.

2. Introduction to the project

On 4 August 2020, a massive explosion at the Port of Beirut (PoB) devastated the city, killing at least 200 people, wounding more than 6,000 and displacing around 300,000 individuals. The explosion caused widespread destruction to homes, businesses, and infrastructure, and disrupted economic activity. In the immediate aftermath of the blast, a Rapid Damage and Needs Assessment (RDNA) was undertaken to estimate the impact of the disaster on the population, changes in economic flows, physical assets, infrastructure, and service delivery in Beirut. Total damages were estimated to be between USD 3.8-4.6 billion, while losses amounted to USD 2.9-3.5 billion, with the housing and culture sectors as the most severely affected.

The World Bank has mobilized financial assistance through the Lebanese Financing Facility (LFF) to support the recovery of select residential buildings of heritage value and cultural and creative industries affected by the PoB explosion.

This rehabilitation and recovery project will be implemented by the United Nations Human Settlements Programme (UN-Habitat), in collaboration with multiple concerned stakeholders. The project will support an integrated urban recovery approach, using housing recovery as an entry point. The project will target residential buildings of heritage value located in socially vulnerable and culturally significant neighbourhoods in the areas affected by the PoB explosion, as well as support the revival of cultural activities that represent a vital source of livelihoods for cultural workers and entities.

The assistance to the impacted areas will contribute not only to the recovery of the physical conditions of the housing, but also to promote a comprehensive regeneration of the diverse neighbourhoods.

The project is structured around the following components: **(1) (i)** rehabilitation of severely and

¹ Secretary-General’s Bulletin: Special measures for protection from sexual exploitation and sexual abuse ST/SGB/2003/13

moderately damaged residential buildings, housing the socially vulnerable; **(ii)** the provision of technical assistance for rental support; **(2)** support to cultural entities and practitioners through the provision of grants for cultural production; and **(3)** project management and institutional capacity building.

2.1 Component 1. Resilient housing recovery reconstruction

This component will be implemented by UNESCO and aims at supporting the return of the displaced socially vulnerable households to the targeted buildings. As such, the component is divided in two subcomponents to contribute to this goal: **(i)** residential housing rehabilitation, and **(ii)** technical assistance for rental support. The housing rehabilitation and the rental technical assistance subcomponents will be implemented as integral parts of the overarching housing recovery strategy and action plan adopting a social stability-sensitive approach to provide assistance through an area-based lens and developed as a separated activity.

Subcomponent 1.1 Residential housing rehabilitation

The subcomponent will prioritize the complex repairs of severely damaged residential units of a historical neighbourhood located within 5km of the epicentre of the blast that have not already been completely rehabilitated, according to a set of criteria. A focus is on a subset of vacant residential buildings that were inhabited by lower-income and socially vulnerable households with low tenure security who may have been temporarily displaced.

Subcomponent 1.2 Technical assistance for rental support

The rental support subcomponent will provide: **(i)** mechanisms to vulnerable renters and landowners of apartment units benefited from the rehabilitation component to achieve sustainable rental agreements and, **(ii)** capacity development to renters in the cadastres of Rmeil, Medawar, Saifi and Achrafieh for them to advocate for renters' rights and minimize eviction risk.

The intended outcome of this subcomponent is to promote the return of the vulnerable households who were living in the affected area prior to the explosion and ensure stability on their rental agreements for a reasonable period after the rehabilitation. To do so, the subcomponent will tackle housing and property (renter-owner) issues within selected buildings to provide the tools to help individuals and facilitate the return of affected households, promoting affordable rental housing and minimize eviction risk.

The outcome of Component 1 of the project: Nearly 31 moderately and severely damaged residential buildings are rehabilitated, and 560 individuals will benefit from rehabilitated residential units damaged by the Port of Beirut explosion.

2.2 Component 2: Emergency Support for Cultural and Creative Industries Recovery

The objective of this component is to provide grants to affected cultural entities and practitioners operating in targeted CCI for the development of cultural productions. This component will finance, and technically support the rollout of cultural productions in neighbourhoods affected by the PoB explosion.

The following indicative CCI will be targeted: i) performing arts; ii) visual arts and crafts; iii) intangible cultural heritage; iv) audio-visual and interactive media; v) heritage and tourism activities; and vi) literature and press. Eligible expenses under the grants scheme are expected to be technical services, equipment, artist fees and operational/running costs. Construction costs, works and repairs are an example of costs that will be excluded, with a comprehensive list of ineligible expenses spelled out in the POM. The timeframe of implementation of each cultural production must not exceed 12 months.

The criteria that guided the prioritization process of cultural and creative industries are the geographic scope, the socio-economic inclusion and the local ecosystem: **i) geographic scope:** selected CCI are present or relevant in the neighbourhoods affected by the PoB explosion; **ii) socio-economic inclusion:** selected CCI are run, implemented by or benefit vulnerable groups and individuals (identified as low-income youth and women, persons with disabilities, the elderly, refugees, displaced people and migrants); and **iii) prevalence/ecosystem of cultural entities/practitioners:** selected CCI are primarily composed of local cultural institutions/centres/associations of a non-profit nature and by self-employed cultural workers.

Subcomponent 2.1 Technical Support for Cultural Actors

An extensive outreach and communication campaign will be conducted to reach out to cultural entities and practitioners operating in Beirut and raise awareness about the project. The campaign will be rolled out by a local organization hired by UNESCO with the following proposed tasks: i) development of needed communication materials; ii) raising awareness about the project; and iii) preliminary identification of interested eligible beneficiaries. Technical support will be provided to cultural entities and practitioners for the design and implementation of cultural productions; cultural entities and practitioners with low capacity will be prioritized. To ensure adequate technical support, the same local organization engaged on the communication and outreach campaign will also perform this technical role.

Subcomponent 2.2. Provision of Grants for Cultural Production

To access support, cultural entities and practitioners will apply for grants under component 2. The Grant Approval Committee (GAC) chaired by UNESCO and comprised of external members (on a pro-bono basis), representatives of both ministerial institutions and local cultural entities active within the cultural sector, will be set up. UNESCO will set clear controls and guidelines to ensure clear, equitable and accountable management of funds. It is expected that the grants will be disbursed in at least two instalments. The POM will spell out the details related to the calls for proposals, mechanics of disbursement of grants and the required documentation to be submitted by grantees, such as narrative and financial reports.

The outcome of Component 2 of the project: Will provide 150 grants to affected cultural actors operating in targeted CCI for the development of cultural productions, benefitting 1,300 direct beneficiaries for cultural production works.

3. Sexual exploitation and abuse in Lebanon: context, risks and perceptions

3.1 Introduction to gender inequality and marginalized groups

Today, Lebanon's economic and financial crisis is categorized by the World Bank as one of the most severe crises globally since the mid-nineteenth century². Additionally, the country has one of the highest overall gender gaps in the world, and rank as 132 out of a total of 153 countries in the World Economic Forum's 2021 Global Gender Gap Report. Lebanon also has amongst the lowest rates of women's political participation (149 out of 153 countries) and labour market participation (139 out of 153 countries).³ Gender inequality is pervasive in Lebanese society, and Lebanon employs multiple laws and practices which both fail to protect and actively discriminate against women and girls, LGBTQI+ individuals, stateless individuals, and survivors of sexual and gender-based violence. Lebanese authorities fail to meet their legal obligations towards protecting women from violence and ending discrimination against them. In addition, economic contraction, skyrocketing poverty rates, and civil unrest have compounded needs among Lebanese and non-Lebanese communities since 2020, and the ongoing crises come with increasing numbers of incidents of gender-based violence.

During crises, structural and entrenched gender norms and discrimination against marginalized population, including women and girls, refugees and migrant workers (especially domestic workers), stateless individuals, elderly, female heads of households, and persons and children with disabilities, and persons from the LGBTQI+ communities, are perpetuated and amplified. This in turn increases vulnerability in large segments of the population, which stems from a historical system of patriarchy, that accept and legitimize systematic discrimination and violations against certain groups, preventing them from participating equally in public life and exercising their fundamental rights.

3.2 Sexual exploitation and abuse risks in Lebanon

The risks of SEA in Lebanon are well described in the [Standard Operating Procedures](#) (SOPs) of the National Prevention of Sexual Exploitation and Abuse (PSEA) Network.⁴ The large number of vulnerable people in combination with the severe economic crisis with escalating poverty rates, public health crisis of the COVID-19 pandemic, and widening civil tensions, make Lebanon a high-risk context for SEA. Lebanon is host to 1.5 million Syrian refugees, an estimated 180,000 Palestinian refugees and refugees of other nationalities, increasing numbers of vulnerable Lebanese, undocumented migrants and migrant domestic workers, many of whom are dependent on humanitarian assistance. The Beirut Port explosion has further exacerbated existing vulnerabilities and risks of SEA, as it has introduced new vulnerabilities and exposed women and girls to heightened risk of violence and exploitation, already significant before the explosion because of the lockdown and the economic crises. The compounded crises currently affecting Lebanon have also increased the protection risks, especially for women, girls, and marginalized groups such as persons with disability, undocumented women and girls, and members of the LGBTQI+ community. Unicef reports that one in two children in Lebanon is at serious risk of physical, emotional, or sexual violence, as families struggle to cope in the country's

² [Spring 2021 Lebanon Economic Monitor](#)

³ World Economic Forum 2017 http://www3.weforum.org/docs/WEF_GGGR_2020.pdf

⁴ Lebanon Standard Operating Procedures (SOPs) Protection for Sexual Exploitation and Abuse (PSEA) Inter-Agency Reporting, Referrals and Feedback on allegations of SEA Beirut Port Explosions Response

deepening crisis. Further, new threats to children are being documented as families become increasingly desperate: including destitute families abandoning babies in the streets and children facing increased risk of abduction.⁵

Incidents of SEA risk going unreported, especially among female refugees and migrant workers due to the fear of retaliation, lack of information on reporting mechanisms and many are not able to report incidents to the authorities due to the absence of a legal residency. This is further supported by data collected through the Gender Based Violence Information Management System (GBVIMS) which indicates that 40 per cent (2020) of survivors have declined accepting referrals to legal assistance services. According to data collected through the GBVIMS in 2020, 1 per cent of survivors reported incidents of exploitation and nearly 4 per cent reported incidents perpetrated by landlords.

According to the Lebanon Protection Monitoring Update Q2, 2022, the percentage of refugees reporting to live under eviction threat has increased from 6.5 per cent in the 1 Quarter of 2022 to 7.2 per cent. Anti-refugee rhetoric growing in the second quarter likely contributed to increasing eviction threats. In the South, eviction threats are increasingly linked to requests for payment of rents in dollars, as a result of misperceptions created by statements of public figures that Syrians are getting aid in dollars.⁶ Further, according to data from the International Rescue Committee (IRC) National Level Monthly Protection Monitoring Report for July 2022, the reliance on debt has emerged as a key coping mechanism for vulnerable population groups due to the severe and prolonged economic crisis. In July 2022, Syrian refugees were 12 percentage points more likely to report facing debt compared to Lebanese respondents. The increased levels of debt are more likely to expose women and adolescent girls to various forms of violence such as physical assault, child marriage, harassment and sexual exploitation.

According to the Gender Statistic Profile developed by UN Women 2022, 50 per cent of Lebanese knew someone who had been subjected to domestic violence, and 31 per cent of Lebanese women had been exposed to domestic violence themselves. 20 per cent of the Syrian girls between 15 and 18 years old were married according to the same report.

With this backdrop, there is a risk that workers, contractors and others involved with the project may take advantage of the situation, and in exchange of money, goods, services, or other things of value, may exploit women and girls.

4. Potential sexual exploitation and abuse risks posed by the “BERYT” Project

The aforementioned protracted financial and political crises in Lebanon, have further increased the risk of GBV, negative coping mechanisms, and especially exploitation, for women and adolescent girls. The explosion introduced new vulnerabilities and exposed women and girls to heightened risk of violence in addition to those already created by the lockdown and the existing

⁵ Unicef, December 2021: Violent beginnings: Children growing up in Lebanon’s crisis

⁶ <https://data.unhcr.org/en/documents/details/94508>

and protracted socioeconomic crises. There is a risk that women, girls, undocumented persons and members of the LGBTQI+ community will be even more exposed to SEA as the situation continues to deteriorate. Limited livelihood opportunities and services and the increased levels of debt are more likely to expose women and adolescent girls to sexual exploitation.

The UN in Lebanon, (I)NGOs and donors, like UN-Habitat, are reliant on using private contractors in the provision of services. In many cases, the presence of private actors, and the role of faith-based organisations and religious figures, as well as private foundations in providing assistance and services to marginalised people in need of humanitarian assistance, can increase the risks of SEA as well as trafficking as in exchange for sexually abusive acts. 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 humanitarian 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 water, electricity, housing, and other local services, such as social and health services, as well as an increased load on ecosystems and natural resources.

According to the WB Good Practice Note (GPN) for major civil works (2022), may increase the demand for sex work and trafficking, forced early marriage, an increase in transactional sex as well as increase GBV as power dynamic between community members and within household shift.⁷ The increase of a large number of workers in the area can also increase the rate of inflation, which can crowd out local consumers, and have other adverse impacts, such as increased volume of traffic and higher risk of accidents. Social conflicts within and between communities, which may be affected by cultural differences between the labour influx and the local communities may arise or escalate, and there may be a potential for increased spread of communicable diseases, and increased drug and alcohol use, violence, rates of illicit behaviour and crime.⁸

In terms of the project, the main risks may include but are not limited to the use of job-related threats or rewards to solicit sexual favours, exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour or solicitation of any type of sex work, buying any sexual favours, unwelcome touching or sexually explicit physical contact. There are potential heightened risks associated with large scale infrastructure projects, primarily associated with an influx of workers to a community and changing power dynamics, as workers are predominantly male, often employed informally, meaning there are no background checks, and are often employed from outside the project area so are only present in the community for a short time. There are opportunities for women to earn an income through support for construction, maintenance or catering, however, this is often temporary and insecure work, which also presents risks.⁹

5. PSEA Community Consultations

⁷ World Bank Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works, 2022

⁸ Ibid

⁹ Global Evidence Review of Sexual Exploitation and Abuse and Sexual Harassment (SEAH) in the Aid Sector, 2021

In Lebanon, the PSEA Network has commissioned a report on PSEA community consultation.¹⁰ The objective of the report, was to map the needs for communication and information for the PSEA Network, to understand affected populations' experiences with available partners and agencies' complaint and feedback mechanisms to respond to PSEA incidents.¹¹ The report is based on qualitative interviews with key informants and vulnerable groups in Lebanon.

One of the findings in the report is that information about services and awareness of SEA incidents are mainly shared through word of mouth, TV-adds, SMS or Facebook messages. Most of the respondents claimed that SEA is always present in Lebanon, and some claimed that cases are increasing with the compounding crises, as more people find themselves in a position of vulnerability and therefore at a higher risk of SEA.

There is also a perception that project workers who are not familiar with the PSEA policy are most likely to commit actions that may be considered as sexual exploitation and abuse. According to the PSEA Network report, most survey respondents reported that at least some SEA events go unreported, but the likelihood varied by the particular situation of SEA, who committed violations and against whom violations were committed. Nearly all participants found SEA interactions worthy of speaking up about in some way, whether or not they believe it actually happens in their community. Most felt that some type of formal reporting was warranted, but some preferred to share the information within the family and not escalate to reporting unless the problem grew.

6. Mitigating measures

Most adverse impacts from any potential labour influx should be mitigated by the contractor hired by UN-Habitat to carry out the works. The responsibilities for managing these adverse impacts will be clearly reflected as contractual obligations, with appropriate mechanisms for addressing non-compliance. This policy is part of UN-Habitat's way of mitigating risks by ensuring that all workers, contractors and staff engaged in the project are trained and well informed about consequences in case of violations of these obligations, including the risk of immediate dismissal, administrative without pay, criminal investigations etc. The different groups involved with implementation of the project and how they may be affected is described below.

An integral part of the SEA Prevention and Response Action Plan includes a tailored and detailed approach to each type of partnership established through the "BERYT" project. These include for example as follows:

6.1 Implementing partner

UN-Habitat has engaged an implementing partner (Al Makassed) for Component 1. This partner will be engaging with stakeholders extensively and will carry an important role when it comes to the selection of buildings for rehabilitation and share information and awareness among the targeted community. As such, everyone from Al Makassed engaged in the project will undergo

¹⁰ Lebanon PSEA Network: PSEA Community Consultation, Lebanon 2022, Ipsos

¹¹ The main findings and recommendations were presented to the UNCT 11 August 2022

training on PSEA, and on how to refer allegations of SEA to UN-Habitat. Al Makassed will be trained on the meaning of a survivor centred approach, and everyone involved with the project will sign the Code of Conduct (CoC), the PSEA Policy (the Policy) and be informed about potential disciplinary actions in case of violations of the CoC and the Policy. Further, Al Makassed will be trained in how the Grievance Mechanism (GM) process works, how to report, log and refer cases to UN-Habitat. PSEA training and monitoring will continue throughout the project lifespan for new staff and as refresher training.

6.2 Contractors and firms

All contractors and firms involved with the rehabilitation of the selected buildings must commit to the protection against sexual abuse and exploitation within the scope of their contracts with UN-Habitat. This includes construction firms, legal firms and design firms. In addition, every worker engaged with the rehabilitation of the buildings must sign the Code of Conduct and the PSEA Policy (included as annex 1). All workers will also undergo training on PSEA and informed about potential consequences of disciplinary action in case of violations of these rules. Workers will also be informed about the GM, both for cases related to their own work and labour management as well as grievances related to SEA.

6.3 Grantees

Under Component 2, UNESCO will ensure that all grantees will sign the CoC and the PSEA Policy before receiving any grants. Grantees will further be trained on PSEA and the GM, similarly to the training provided to contractor workers and the abovementioned implementing partner. All grantees will be informed that allegations of SEA constitute criminal offences, and as such will be reported to the police for further investigation. All workers/contractors will be informed that any exchange of money, goods, services, or other things of value, for sexual favours or activities is strictly prohibited and that they are prohibited from engaging in any sexual activities that are exploitive or degrading to any person.

7. Stakeholder engagement

The Stakeholder Engagement Plan prepared by UN-Habitat includes a feedback/grievance mechanism related to SEA, and information about the grievance mechanisms will be present and visible at the project sites. The GM team will in close coordination with implementing partners and UNESCO engage with stakeholders, both in direct meetings, as well as ensure stakeholders are informed about the GM on social media, with targeted email and text messages and flyers. The UN-Habitat GM team will conduct training on PSEA and awareness of the GM. The entire GM team is trained on PSEA, and how to refer allegations of SEA to the Office of Internal Oversight Services (OIOS). The GM team has been [trained](#) in how to safely refer survivors and victims of SEA to expert GBV providers through the national GBV working group [referral system](#). The GM team works with a survivor centred focus, and any actions and referrals are based on the informed decision of the survivor.¹² The national Protection working group has developed [minimum standards](#) for referrals. The GM team is in close contact with the national PSEA framework as well as the national GBV working group. Further, UN-Habitat has established a GM

¹² E&S Specialist: Jenny Kotz Bjerlestam (also GBV), E&S team member/GM coordinator: Maryam Nazzal, GM operator: Aziza Yassine.

Committee that will address decisions by the GM team that are appealed, according to the [Stakeholder Engagement Plan](#) (SEP).

All actors who may come into contact with GBV survivors are responsible to be knowledgeable about the GBV referral pathways and what forms of assistance the survivor can expect through referral to other actors.

8. Action Plan

A detailed Action Plan and corresponding work-plan for the activities to prevent and respond to potential allegations of SEA are outlined in the table below. The GM team E&S Specialist is also a GBV Specialist. The implementing partner has also an E&S specialist within the team who will oversee training and awareness and signing of code of conduct as well as refresher training as needed.

8.1 Grievance Mechanism contact details

- **Website:** the website is currently functioning [here](#). Complaint forms exist and can be submitted in Arabic or English. When the complaint form is submitted on the site, a message appears with the confirmation of receipt of the feedback/complaint and that a response will be shared with the complainant within ten days of receipt. Urgent and/or sensitive cases require a response within 48 hours. The website is monitored daily by the above-mentioned GM team.
- **E-mail:** The created email address: unhabitatlb-gm@un.org is being monitored daily by the GM team. Once an e-mail is received to the GM account, an automatic reply will be sent confirming the receipt of the feedback/complaint and that a response will be shared with the complainant within ten days of receipt. Urgent and/or sensitive cases require a response within 48 hours.
- **WhatsApp:** The WhatsApp account seems to be the most favourable channel used by beneficiaries: (+961 815 823 76). Once a message is recorded (voice or text) an automatic reply is sent confirming the receipt of the feedback/complaint and by when the GM is expected to provide feedback. Only the GM team will have access to the device, and all grievances are logged and registered and regularly reported to the World Bank.
- **Complaint boxes:** The boxes were procured and ready to be installed. However, it was decided to postpone fixing the boxes until contractors start their work.
- **In-person GM:** The project implementing partners, Al Makassed, will receive in-person complaints. All complaints will be registered and logged by Al Makassed, and cases will be referred to the GM team daily.

8.2 Sexual Exploitation and Abuse Prevention and Response Action plan: Workplan

	Activity to address SEA/SH risk	Steps to be taken	Timeline	Responsible	Monitoring (who will monitor)	Output indicators	Estimated budget
1	Sensitize engineer, contractors Implementing Partners (IPs) and grantees on the importance of addressing SEA during the implementation of the project, and the mechanisms that will be implemented to do so.						
	<p>Sensitisation and training on SEA will include:</p> <p>Definitions and Information of what constitutes SEA</p> <p>Accountability and response framework (disciplinary actions and breach of contract)</p> <p>Responsibilities and reporting</p> <p>Confidentiality and whistle blower protection clauses</p>	<p>Develop PSEA policy including accountability and response policy.</p> <p>Develop plan for conducting training of contractors, IPs and grantees.</p> <p>Develop training material related to PSEA for contractors, IPs and grantees.</p> <p>Develop whistle blower policy.</p> <p>Develop Code of Conduct</p>	<p>Within two months of IP/contractors/grantees/workers hiring + on a rolling basis according to need + refreshers throughout project duration.</p>	<p>GM team</p>	<p>E&S Specialist</p>	<p>Number of persons trained</p>	
	<p>Incorporate SEA requirements and expectations in the</p>	<p>Include clauses for accountability and disciplinary</p>	<p>Within two weeks of</p>	<p>GM team</p>	<p>Head of Country Programme,</p>	<p>Contracts finalised</p>	

	contractor and consultants' contracts	measures in cases of violations of SEA requirements	contracts awarded		Dep Head of Country		
	Codes of Conduct signed and translated in the local language	Codes of conducts drafted Colleague inputs/review to Code of Conduct Code of conduct developed and approved and translated	End of August 2022	GM team	Head of Country Programme, Dep Head of Country	Existence of CoC (included as Annex II)	
2	Map out GBV prevention and response service providers able to provide care to SEA survivors						
	Map out and review capacity and quality of GBV service providers in the project area able to provide care and support SEA and SH survivors	Mapping of GBV service provider for project undertaken	End of April 2022	GM team	GBV service provider mapping, ANNEX I	Mapping shared with WB as annex to first progress report	
	Establish multi-sectoral GBV/SEA referral pathway(s)	Referral pathway established, and direct contact with GBV WG and PSEA national network to continue throughout Project.	Throughout project	GM team	GM team through progress report	Referral pathways existing through national networks	Interagency referral form
3	Inform project-affected communities about SEA risks						
	Develop Stakeholder Engagement Plan for SEA - related issues	Develop workplan with indicative dates for Stakeholder	Before August 2022 and ongoing	Implementing Partner, monitored by GM team	GM team	Number of stakeholder engagement meetings	

		engagement meetings, develop communications material	throughout project			Number of participants disaggregated by gender and age	
	Stakeholder consultations undertaken as per the SEP and stakeholder meetings occur regularly, at quarterly basis.	Stakeholder consultations to be undertaken throughout the project Meet with CBOs/CSOs Meetings with government institutions	Ongoing throughout project	Implementing Partner, monitored by GM team	GM team	Number of stakeholders including number of stakeholders representing marginalised groups (list of participants with disaggregated data)	
	Identify, train and establish community focal points for SEA	Develop selection criteria of community focal points Conduct one training for selected focal points	February 2023	GM team IP	GM team	Number of focal points existing for SEA activities Number of focal points trained	
	Conduct community sensitization on SEA	Disseminate SEA material developed by PSEA Network Hold awareness sessions about SEA material and GM	Ongoing throughout project	Implementing Partner, overseen by GM team	GM team	Number of awareness sessions disaggregated by gender and age	
4	Ensure SEA and SH sensitive channels for reporting in GM						

	Develop/review GM for specific SEA procedures	Draft GM policy Establish GM channels Adopt PSEA network SOP	End of June 2022	GM team	GM team	Existing GM channels Flowchart for GM procedures, progress reports	
	Review GM reports/logs for SEA/SH sensitivity	GM reporting logs and tools drafted	End of July 2022	GM team	GM team	Existence of log of complaints, progress reports Existence of reports of complaints	

ANNEX I

Mapping of SGBV service providers Lebanon

UN-HABITAT will establish a Grievance Redress Mechanism (GRM) for the Beirut Housing Rehabilitation and Cultural and Creative Industries Recovery project. The Grievance Redress Mechanism will have referral pathways in the event of sexual exploitation and abuse/sexual harassment (SEA/SH) related complaints. Given the risk of stigmatization for SEA/SH complaints, the UN-Habitat GRM will provide multiple channels to safely submit their grievances and complaints for SEA/SH survivors. UN-Habitat will partner with local GBV service providers to ensure that survivors can have immediate access to GBV support after a complaint.

This document is a mapping of GBV service providers in Lebanon. The mapping was undertaken by UN-Habitat's E&S Specialist in April 2022. The principles of confidentiality and anonymity will be implemented along with a survivor centric approach. GBV services are in this document specific services for GBV survivors, such as health services, psychosocial support, shelter, legal aid, safety/security services, etc.

Lebanon has a variety of small actors providing specialised services of legal assistance, focusing on certain types of cases such as statelessness, SGBV or LGBTIQ cases.

Organisation	Type services	Geographical Presence	Target beneficiaries
ABAAD	Legal assistance Safe Shelters Case Management	Country wide	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
AMEL	Case Management	Baabda, Beirut, El Metn	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL), Migrant workers/ Other nationalities
AND	Case Management	Akkar	Lebanese, Syrians
Care		El Metn, Baabda, Iey, Chouf, El Meten, Jbeil	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL), Migrant workers/ Other nationalities

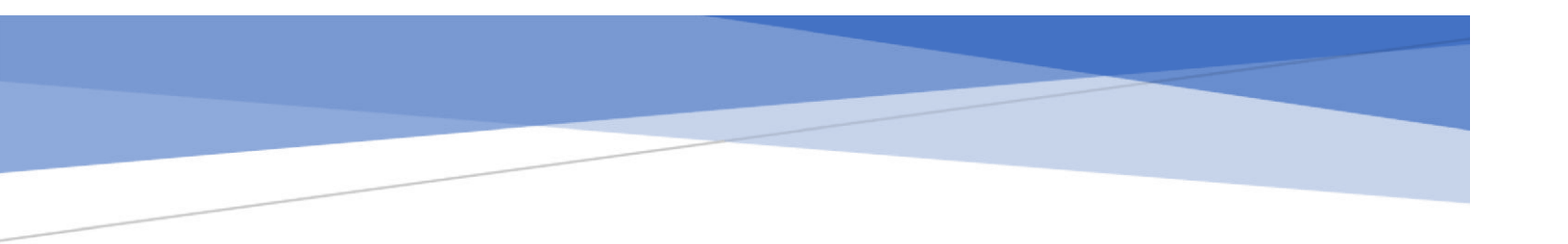
Caritas	Legal assistance (for GBV related issues) Safe Shelters	South and Mount Lebanon	Syrians, Migrant workers/ Other nationalities
Concern	Case Management	Beirut	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL), Migrant workers/ Other nationalities
Danish Refugee Council (DRC)	Case Management	Akkar, Bcharre, El Batroun, El Koura, El Minieh-Dennie, Tripoli, Zgharta	Women and Girls, LGBTQI+
Dorcas	Specialized Mental Health Legal assistance (for GBV related issues)	Batroun, Aley	All groups

	Case Management		
Helem	Specialized Mental Health Legal assistance (for GBV related issues) Case Management	LGBTQIA+	National

Himaya	Case Management	Marjaayoun, Saida, Baalbek, El Hermel	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
IMC	Case Management Specialized Mental Health	Kerswane, Zahle	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL), Migrant workers/ Other nationalities
International Rescue Committee	Legal assistance (for GBV related issues) Case Management	Akkar, Aarsal, Qaa Baalbek	Syrians, Lebanese
Intersos	SGBV legal assistance Case Management	El Metn, Aley, Bent Jbeil, El Nabatieh, Hasbaya, Marjaayoun, Saida, Sou	Syrians, Lebanese, Migrant workers/ Other nationalities
KAFA	Legal assistance (for GBV related issues) Safe Shelters Case Management	Mainly Beirut, Zahle, West Bekaa, El Hermel, Baalbeck, Rachaya	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
Key of Life	Case Management	Aley, Baabda, Beirut, Chouf, El Meten, Jbeil, Kesrwane	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL), Migrant workers/ Other nationalities
Legal Action Worldwide	Legal assistance (for GBV related issues)	Aley, Baabda, Chouf, El Meten, Jbeil, Kesrwane,	Syrians, Lebanese

	and strategic litigation	Akkar, Tripoli, Zgharta	
Magna Lebanon	Specialized Mental Health	Baalbek	Syrians, Lebanese
Makhzoumi	Clinical Management Rape / Health Case Management	Baabda, Beirut, Aley, Baabda, Beirut, Chouf, El Meten, Jbeil, Kesrwane	Syrians, Migrant workers/ Other nationalities
Medicins Sans Frontiers	Clinical Management Rape / Health	Beirut, Mount Lebanon, Aarsal	All groups
Mercy Corps		Hasbaya, Jezzine, Sur, El Nabatieh, Marjaayou, Baalbeck, Zahle, West Bekaa	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
Mosaic MENA	Clinical Management Rape / Health Specialized Mental Health Legal assistance (for GBV related issues) Case Management	El Hermel, Baalbeck, Zahle, West Bekaa, Rachaya	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
Nabad	Case Management	Zahle	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
RDFL	Case Management	Baalbek	Syrians, Lebanese, Palestinian

			Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
RESTART	Specialized Mental Health	Akkar	All groups
SIDC NGO	Specialized Mental Health Clinical Management Rape / Health Case Management	National	Key populations
TdH Lebanon	Specialized Mental Health (only adolescent girls and child marriage) Case Management	Saida, Sur, Aley, Baabda, Beirut, Chouf, El Meten, Jbeil, Kesrwane	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)
URDA	Case Management	Akkar, El Minieh-Dennie, Aaley, Baalbek, Zahle	Syrians, Lebanese, Palestinian Refugees from Syria (PRS), Palestinian Refugees from Lebanon (PRL)



POLICY FOR PROTECTION
AGAINST SEXUAL
EXPLOITATION AND ABUSE
**Beirut Housing Rehabilitation and
Cultural and Creative Industries
Recovery Project, BERYT**
UN-Habitat implementing partners

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1. Policy statement

UN-Habitat aims at protecting its beneficiaries and all vulnerable populations, as well as its employees and related personnel, from sexual exploitation and abuse (SEA) and sexual harassment (SH) during the implementation of the *Beirut Housing Rehabilitation and Cultural and Creative Industries Recovery Project* the **BERYT** Project.

This Policy is directly related to the Project's Environmental and Social Safeguards (ESS), and is linked to the Project's Environmental and Social Commitment Plan (ESCP). The aim of this policy is to provide a safe environment for the Project beneficiaries, Project employees and other stakeholders. UN-Habitat and its partners have a zero-tolerance policy for any form of sexual exploitation and abuse, or sexual harassment, and is committed to treating all incidents seriously, and promptly investigate any allegations. Through this Policy, the BERYT project will uphold this zero-tolerance against SEA/SH by creating awareness among beneficiaries (including cultural entities and practitioners), implementing partners and contractors, including employees, consultants, labourers or volunteers, and other stakeholders of what SEA and SH is, by prohibiting SEA and sexual harassment, and by enforcing mechanisms to address complaints about suspected SEA and SH. This will be done by conducting stakeholder engagement meetings, focus group discussions, as well as through media and communications channels, social media, and flyers.

1.2 Policy scope

This policy applies to implementing partners and contractors, including employees, consultants, labourers or volunteers. UN- staff are regulated by the UN Secretary-General's Bulletin on protection from sexual exploitation and abuse.¹³

For implementing partners, the UN is bound by the United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners.¹⁴ As set out in the Protocol, the UN does not partner with entities that fail to address sexual exploitation and abuse through appropriate preventive measures, investigation and corrective action. It is further stated that such failures shall constitute grounds for the termination of any cooperative arrangement with the UN. The UN shall have a victim/survivor centred approach, meaning that the human rights, interests and needs of victims and survivors must be at the centre of the efforts to protect beneficiaries against sexual exploitation and abuse. Further, the UN must adhere to the principles of "do no harm," confidentiality, safety and non-discrimination when responding to allegations of sexual exploitation and abuse. In cases involving children, all decisions made regarding the prevention and response to SEA allegations involving implementing partners of the UN must be guided by the best interests of the child and the right of the child to participate and to be heard.

This policy is applicable both during and outside normal working hours. Sexual exploitation and abuse and sexual harassment are prohibited whether such acts take place within the project premises and sites or outside, including at social events, business trips, training sessions or conferences sponsored by the Project. This policy will apply in the event it is more stringent than Lebanese legislation.

¹³ UN Secretary-General's Bulletin on protection from sexual exploitation and abuse (ST/SGB/2003/13)

¹⁴ United Nations Protocol on Allegations of Sexual Exploitation and Abuse Involving Implementing Partners, 21 March 2018

Anyone who has been subject to, or suspects any form of sexual exploitation and abuse or sexual harassment by anyone involved with the Project can provide feedback, make an inquiry or request or complaint. Any complaints related to sexual exploitation and abuse will be referred to the UN Office of Internal Oversight Services (OIOS) and will be investigated by trained investigators. Victims and survivors will be referred to experienced service providers locally who are experts in Gender Based Violence (GBV).

Anyone who has been subject to, or suspects any form of sexual exploitation and abuse or sexual harassment by anyone involved with the Project can provide feedback, make an inquiry or request or complaint.

Any investigation will be done in line with UN Secretariat rules and regulations). All UN implementing partners are obliged to report any allegations of SEA to the Network. If the project receives any alleged SEA case – implicating any category of personnel related to the project, including implementing partners, contractors, contractors’ staff, consultants or any other person engaged with, or representing the project – the GM team will refer the allegation to the Office of Internal Oversight Services (OIOS) – the competent authority (for UN-Habitat / UN agencies) delegated with the responsibility to look into and investigate SEA and SH allegations. Any such investigation will be conducted in close coordination with the Head of UN-Habitat Lebanon, and the Resident/Humanitarian Coordinator will also be kept informed about any allegations yet respecting the confidentiality around the allegations. All incidents of alleged SEA will be reported to the WB within 48 hours.

Survivors will be referred to experienced service providers locally who are experts in Gender Based Violence (GBV).

All feedback, inquiries, requests or complaints may be delivered **anonymously**. All personal data will remain **confidential** and will not be shared with external parties.

1.2 Policy framework

All acts of sexual exploitation, abuse or harassment undertaken by any implementing partners and contractors, including employees, consultants, labourers or volunteers, will have consequences in accordance with this policy.

Allegations of sexual exploitation and abuse will be treated as a prima facie criminal offence. Any implementing partner, contractor, or organisation linked to the Project found not having addressed allegations or concerns of sexual exploitation and abuse by their employees, consultants, labourers or volunteers, risk having their contract/Agreement of Cooperation (AoC), Memorandum of Understanding (MoU) or any other engagement with the Project terminated and will be referred to law enforcement after obtaining the informed consent by the survivor(s). Any employees, consultants, labourers or volunteers involved with the Project must have signed and understood the Project Code of Conduct (annexed).

If the survivor(s) does not want the matter referred to law enforcement, UN-Habitat will as far as it is reasonable and possible, respond to the incident in the way preferred by the survivor(s). In this case, a report may be filed to law enforcement without mentioning any of the survivor(s)’ identifying details. If the survivor is

under the age of 18, UN-Habitat will refer the alleged perpetrator to law enforcement in accordance with the Lebanese mandatory reporting requirements for child sexual abuse.

Sexual harassment will be considered prima facie a criminal offense according to the Law 205¹⁵. In cases not covered by the law, but considered sexual harassment under this policy, and the Code of Conduct, sexual harassment will be considered a disciplinary issue, which may be a sufficient ground for termination. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. Any person facing allegations of sexual harassment, sexual exploitation and abuse may be put on administrative leave while investigations are undertaken. Any individual suspected of sexual harassment under the Law 205 will be referred to law enforcement after obtaining the informed consent by the survivor(s).

All complaints of sexual exploitation and abuse, and sexual harassment, will be taken seriously and treated with respect and confidentiality. UN-Habitat has established a Grievance Mechanism (GM) to ensure the safety, confidentiality, transparency and accessibility of its reporting mechanism. No one will be victimized for making a complaint.

1.3 Protection from retaliation and/or retribution

The BERYT project will take all actions necessary to safeguard any person who files a complaint via its GM, including the survivor, employees, consultants, labourers or volunteers as well as other stakeholders involved with the Project, to ensure that complainants do not face retaliations or retributions. No adverse employment action, such as termination or the issuing of warnings, will be taken against any employees, consultants, labourers or volunteers in retaliation for reporting allegations which they reasonably believe to be true.

However, employees, consultants, labourers or volunteers making false allegations with disregard for their truth or falsity, with the intention to cause harm to a colleague, may be subject to disciplinary action, up to and including termination.

2. Principles

The BERYT project is committed to the ongoing implementation of the Six Core Principles set by the *Inter-Agency Standing Committee* (IASC) Working Group.¹⁶ This Policy is based on the core principles as follows:

1. Sexual exploitation and abuse by employees, consultants, labourers or volunteers constitute acts of gross misconduct and are therefore grounds for termination of employment. Sexual harassment is grounds for disciplinary action up to and including termination of employment/contract/agreement. According to Law 205, sexual harassment may also constitute a crime and can therefore be referred to law enforcement.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.

¹⁵ Law No. 205 For the criminalization of sexual harassment and rehabilitation of its victims

¹⁶ Six Core Principles relating to Sexual Exploitation and Abuse, set by the Inter-Agency Standing Committee (IASC) Working Group

3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between employees, consultants, labourers or volunteers and a person benefitting from the Project that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of the Project.
5. Where an employee, consultant, labourer or volunteer develop concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether working with the same organisation/contractor or not, he or she **must** report such concerns via the Project Grievance Mechanism. Failure to do so, may result in disciplinary actions towards those knowingly withholding such information/suspicions.
6. Implementing partners and contractors are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems and monitoring which maintain this environment.

3. Definitions

3.1 Sexual Exploitation

The term *sexual exploitation* 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.¹⁷

3.2 Sexual Abuse

The term *sexual abuse* means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.¹⁸

Sexual exploitation and abuse and may include incidents from the following categories, but are not limited to:

- Sexual violence
- Physical violence
- Emotional and psychological abuse

The actions or threats may involve one or more incidents, and they may be verbal and non-verbal. Examples of behaviour that constitute sexual exploitation and abuse include but are not limited to:

3.3 Sexual violence

- Rape or attempted rape

¹⁷ UN Secretary-General's Bulletin on protection from sexual exploitation and abuse (ST/SGB/2003/13)

¹⁸ Ibid

- Sexual assault
- Any sexual activity with a minor (persons under the age of 18 years)
- Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour
- Solicitation of any type of sex work, buying any sexual favours
- Unwelcome touching
- Sexually explicit physical contact
- Forcing another to view, record or share sexually explicit content (such as pictures or videos of pornographic nature).

3.4 Physical violence

Any act of physical violence that is not sexual in nature. Examples include hitting, slapping, choking, cutting, shoving, burning, shooting or use of any weapons, or any other act that results in pain, discomfort or injury.

3.5 Emotional and psychological abuse

- Threats of any of the above-mentioned types of violence
- Staring or leering
- Intimidation
- Humiliation
- Stalking
- Verbal harassment

3.6 Sexual Harassment

Sexual harassment is defined as any unwelcome sexual advance, comment, expressed or implied sexual demand, or any other communication or conduct of a sexual nature, whether verbal or physical by any person to another individual within the scope of work. It may cause offense or humiliation to another, create a hostile work environment, or it can be made a condition of employment. Sexual harassment happens between Project workers, whether employees, contractors, consultants or volunteers engaged in the Project.

Sexual harassment may include, but is not limited to:

- Suggestive comments or jokes
- Sexually explicit pictures or posters
- Unwanted invitations to go out on dates
- Requests for physical intimacy
- Intrusive questions about a person's private life or body
- Unnecessary familiarity, such as deliberately brushing up against a person
- Insults or taunts based on sex or gender
- Sexually explicit emails or text messages
- Sexually suggestive gestures
- Comments on a worker's appearance, age, private life, etc. and
- The use of job-related threats or rewards to solicit sexual favours and
- Condescending or patriarchal remarks.

4. Persons involved

4.1 Survivor or victim

The *survivor or the victim* is the person who has experienced sexual exploitation, abuse or sexual harassment. In the context of this policy, the terms victim and survivor are used interchangeably. Any person can be a victim of sexual exploitation and abuse or sexual harassment, regardless of their sex and gender. Sexual exploitation and abuse or sexual harassment may also occur between people of the same sex.

4.2 Complainant

The person who raises a complaint. This may or may not be the victim/survivor.

4.3 Whistle-blower

The person who informs about suspected unlawful or immoral activity, such as sexual exploitation and abuse and sexual harassment on UN-Habitat employee or Project staff, including employees, consultants, labourers or volunteers.

4.4 Complaint

A specific grievance by anyone who has been negatively affected by the actions of someone involved with the Project, or anyone who believes that UN-Habitat has failed to meet its commitment. A complaint requires a response.

4.5 Subject of complaint

The person against whom the complaint, allegation, or concern has been raised.

5. Grievance Mechanism

5.1 Raising a complaint, provide feedback, make an inquiry or send a request

UN-Habitat has under the Project established a Grievance Mechanism. The BERYT project is committed to take safe and ethical action as quickly as possible when incidents do occur. Consequently, the BERYT project is committed to protecting its beneficiaries and the vulnerable community it serves against sexual exploitation and abuse.

The grievance mechanism ensures multiple channels for beneficiaries, stakeholders and Project workers to safely submit complaints/feedback/inquiries or requests that may involve grievances against the BERYT project, including report sexual exploitation and abuse, and for employees, consultants, labourers or volunteers to safely report sexual harassment. These channels were designed based on the [World Bank's Good Practice Note](#) to ensure that the GM is safe and accessible.¹⁹ The BERYT project recognizes, that, because sexual exploitation and abuse and sexual harassment often stem from unequal power dynamics, victims often

¹⁹ World Bank Good Practice Note Environmental & Social Framework for IPF Operations Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works, second edition

feel that they cannot come forward. Accordingly, the BERUT project understands the need to support victims and survivors in making complaints. The BERYT project is committed to provide a victim centred approach to make sure that victims and survivors get support needed by experts, by referring them to service providers offering this support, and that all actions are undertaken on the wishes of the survivor.

The BERYT project ensures that all employees, volunteers, consultants and volunteers are made aware that they can approach the GM team responsible for receiving complaints of sexual exploitation and abuse/sexual harassment.

Any individual can file a complaint or raise a concern to the GM team about an incident they have experienced, witnessed, or heard about concerning a staff member or related personnel (contractor, consultant, supplier, partner, etc.) without fear of retribution, and without investigating allegations or suspicions themselves. The GM team commits to responding in a timely manner to all allegations or concerns of sexual exploitation, abuse or harassment. All concerns or allegations will always be taken seriously, and investigated and acted upon as appropriate. This includes anonymous allegations.

5.3 Reporting channels

Anyone, including Project beneficiaries, stakeholders, implementing partners, employees, consultants, labourers or volunteers can make a complaint or raise a concern to the GM team about any incident they have experienced or witnessed without fear of retribution or retaliation. The reporting channels are:

- Dedicated **Grievance number** +961 81582376. This line is operated and managed by the GM team, and is accessible both via direct calls and WhatsApp. The number is checked and responded to daily.
- Dedicated **GM email** address: unhabitat-lb-grm@un.org This email account is accessible by the GM team only, and checked daily during business hours.
- Dedicated form on **website**: <https://unhabitat.org/grievance-redress-mechanism-beiruthousing-rehabilitation-and-cultural-heritage-and-creative>
- **Comment/complaint boxes**: Boxes are installed in a number of places. Accessible for persons with disabilities and checked weekly by the GM team. Information about the physical locations of the boxes will be shared on various communication platforms, including the GM information flyer, in stakeholder meetings and social media platforms.
- **In person** to complaints to the Project implementing partner or GM team
- **Social media platforms** (Facebook, Instagram, etc) These platforms are monitored by UN-Habitat's communications team. Any grievances to these platforms will be referred to the GM team internally.

6. Types of complaints

6.1 Admissible vs. inadmissible submissions

Submissions are to be divided into admissible and non-admissible. Submissions that are considered as inadmissible, are the ones that don't fall under the scope of the Project; i.e., inadmissible complaints are requests for services, general inquiries, or any other forms of submissions that the project does not offer. Admissible complaints are any submissions that are considered to fall under the scope of the Project, and

which UN-Habitat, its implementing partners or contractors are responsible for, such as violations of, or breach of the code of conduct. It refers to specific grievances of anyone who has been negatively affected by the Project, and that UN staff under the project, implementing partners or contractors have been involved in the violations. For straightforward/inadmissible grievances, designated staff will provide a response without further investigation within max ten days from the initial date of receipt of the grievance, where actions are proposed to resolve the complaint and agreement on the response is sought with the complainant.

6.2 Sensitive vs. non-sensitive complaints

The BERYT project further makes a distinction between sensitive and non-sensitive complaints; whereas non-sensitive complaints in general are not urgent, and that do not require immediate intervention. Non sensitive complaints are complaints that if processed over a long period of time, no further harm would be inflicted on the complainant or the entity involved. Non-sensitive complaints are typically related to Project, and could capture complaints about who is targeted and why, or quality of products and services. Non-sensitive complaints can also be considered as complaints related to staff misbehaviour/misconduct, ones that are not severe with minor breaches of the code of conduct. Sensitive complaints relate to issues such as exploitation, abuse or harassment, including sexual exploitation and abuse, discrimination, corruption, and fraud, among others. Sensitive complaints are considered to be urgent and require immediate intervention and investigation in which action should be taken between 12 to 48 hours. All sensitive complaints must also be shared with the WB without delays.

For sensitive complaints that require further assessment, designated staff will further engage with the complainant via a phone call or a formal meeting in order to collect further information. Based on this, they will provide, within 14 days from the initial date of receipt of the grievance, actions proposed to resolve the complaint and agreement on the response is sought with the complainant.

6.3 Feedback, inquiries, or requests

Feedback, inquiries or requests refer to unsolicited opinions, criticism, praise and/or suggestion communicated in a verbal or written form, through formal or informal channels. The GM team aims to engage with a wide range of stakeholders, representing different communities or groups, in particular marginalised groups. The GM team engages with stakeholders through stakeholder meetings, as well as via social media and focus group discussions.

6.4 Referrals

This refers to the process of directing a victim or survivor to expert service provider(s) that can offer tailored support. Referrals will only be undertaken if the victim or survivor agrees to it, and all information will be kept confidential. A referral can be made to a variety of services providers with expertise in Gender Based Violence, such as psychosocial support, medical support, legal assistance or other GBV-related support.

7. Core principles of the Grievance Mechanism

- Accessibility: this policy is designed and established in ways that will allow as many people as possible from as many groups as possible in the locations where the Project is implemented, to raise feedback, inquiries, requests or complaints.
- Confidentiality: The GM is confidential and all relevant information, records and documents are stored in secure places only accessible to the GM team. Information is shared on a strict need-to-know basis only with a limited number of selectively specified people for the purpose of taking actions, including the GM Committee.
- Transparency: The procedures to submit feedback, inquiries, requests or complaints should be clear, transparent and explained to all stakeholders in ways that can understand.
- Safety: The GM considers potential risks and dangers for all those involved in the process. The GM takes measures to prevent harm such as ensuring confidentiality, referral to GBV service providers and protecting whistle-blowers.
- Responsiveness: UN-Habitat strives to provide a response to all feedback, inquiries, requests or complaints received. Responses will be provided within a reasonable timeframe, based on the resources available and the information received. To achieve this, all channels used for the GM include procedures on how to submit grievance, and what and when to expect in reply. The GM team will log and register all feedback, inquiries, requests or complaints for oversight purposes.
- Independent: The GM team will act to ensure that channels to submit grievances effectively avoid real or perceived conflict of interests. In serious cases, decisions of disciplinary measures will be taken by the GM Committee.

8. GM intake

All feedback, inquiries, requests or complaints will be taken seriously and logged. All information will be addressed to the GM team, including ESS experts and social workers. The GM is designated as the safeguarding focal point, and is the primary recipient of the feedback, inquiries, requests or complaints. The GM will be trained in SEA including in efficient referrals of the victim to GBV service providers and able to handle SEA related complaints. All information or allegation that indicate that the complaint involves sexual exploitation and abuse will be referred to the United Nations Office of Internal Oversight Services (OIOS) for expert investigations. Any such investigation will be conducted in close coordination with the Head of UN-Habitat Lebanon, and the Resident/Humanitarian Coordinator will also be kept informed about any allegations yet respecting the confidentiality around the allegations.

In case of grievances related to PSEA/SH, the only information requested will be:

- The nature of the complaint
- Information about whether the perpetrator was associated with the project
- Age and sex of the perpetrator; and if possible
- Information on whether the survivor was referred to services

In cases where the allegation is against the safeguarding focal point, or if there is a conflict of interest, the Executive Director will appoint another focal point to conduct the investigation. In cases of alleged conflict of interest, this can be appealed to the GM Committee whose role it is to reach a conclusion and decision of the appealed complaint. The decision of the GM Committee will be the final decision and the complaint will be considered closed once the decision has been conveyed to the complainant. The GM Committee will only address cases that are not related to SEA or other sensitive or potentially criminal cases, such as alleged corruption or violations against other laws as regulated in the penal code which have their respective mechanisms and referral

systems applied. All grievances will be handled confidentially, and no personal information will be shared outside the GM Committee.

8.1 Investigation process

If PSEA allegations are considered to be credible, the subject of the complaint should be notified verbally and in written. If the allegations are against employees or workers employed by a contractor or employees, consultants or volunteers employed by an implementing partner, the IP or contractor will inform the subject of complaints.

The GM team should decide on and enforce temporary necessary sanctions and disciplinary measures based on the initial findings until investigations have been concluded. Temporary actions can be, but are not limited to suspension/administrative leave, with or without payment, reduction in payment, referral to criminal action. If the case is referred to law enforcement for criminal actions is always the decision of the survivor.

Once OIOS has undertaken and finalised the investigation, the sanctions and disciplinary measures for any incidents of sexual exploitation, abuse or harassment may include but are not limited to: Verbal or written warning, adverse performance evaluation, reduction in wages/transfer, demotion, suspension/administrative leave, dismissal or criminal action.

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of SEA and sexual harassment are not treated as trivial.

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.

9. FLOWCHART

