

SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARASSMENT PREVENTION AND RESPONSE ACTION PLAN

PROJECT: HORN OF AFRICA GROUND WATER FOR RESILIENCE PROJECT - ABAAR TIR

LOCATION: Somaliland.

Level of Risk Identified through Risk Assessment: Substantial

Introduction

The Horn of Africa Ground Water for Resilience project is part of a regional, multi-phased initiative project planned to be implemented by Kenya, Ethiopia, Somalia and Somaliland, Djibouti, Sudan and the Intergovernmental Authority in Development (IGAD). The project gives emphasis to community-level water distribution and use and engagement in the management, operation and maintenance of Ground Water (GW), cost-effective infrastructure interventions, GW information and knowledge, as well as institutional capacity building to ensure inclusive access and sustainability of the resource.

The project is expected to improve access to safe and clean water through investments in new supply and rehabilitation of existing systems, address urgent WASH needs, and construct and rehabilitate distribution systems. The project will undertake geological, hydrogeological, and geophysical surveys in order to identify the location of promising aquifers and water points for development, increased and better-quality groundwater supply. The project will also train professional staff, establish groundwater offices and arrange access to required data and management.

This action plan details the necessary operational measures and protocols that will be put in place to address sexual exploitation and abuse and sexual harassment (SEAH). It will include how to resolve any SEAH allegations that may arise. Also, procedures for preventing and responding to SEAH, how complaints of SEAH will be handled (investigation procedures), and disciplinary action for violation of the Code of Conduct (CoC) by workers.

Definition of terms

The Inter-Agency Standing Committee (IASC) defines **gender-based violence** as “an umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed (gender) differences between males and females. GBV broadly encompasses physical, sexual, economic, psychological/emotional abuse/violence including threats and coercion, and harmful practices occurring between individuals, within families and in the community at large. These include sexual violence, domestic or intimate partner violence, trafficking, forced and/or early marriage, and other traditional practices that cause harm.

The United Nations defines “**sexual exploitation**” as 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. **Sexual abuse** on the other hand is “the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.” SEA is therefore a form of gender-based violence and generally refers to acts perpetrated against beneficiaries of a project by staff, contractors, consultants, workers and Partners.

Sexual harassment is defined as any unwelcome sexual advance, request for sexual favor, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. It occurs between personnel/staff and involves any unwelcome sexual advances or unwanted verbal or physical conduct of a sexual nature.

Contextual GBV Risks

Gender-based violence (GBV)¹ is one of the most prevalent human rights violations globally and a public health problem of epidemic proportions. GBV affects men, women and children, but it disproportionately affects women and girls and exists in every country and environment where the Bank operates.

GBV in particular rape, domestic abuse and the harmful tradition of female genital mutilation are common occurrence in Somaliland² Data shows that over 96% of women in Somaliland between the ages of 15 and 49 had undergone FGM/C. The Somaliland health and demographic survey findings show that more than 70 per cent of women interviewed indicated different forms of domestic violence: physical assault, denial of education, forced marriage, rape and sexual harassment.

¹ GBV includes a range of violations, including i) intimate partner violence; ii) non-partner sexual abuse; iii) harmful practices; iv) human trafficking and v) child sexual abuse. It is expected that the country and regional integration profiles will highlight the most prevalent forms of GBV within each country and provide considerations for how to address these risks most effectively.
<http://www.worldbank.org/content/dam/Worldbank/document/Gender/Arango%20et%20al%202014.%20Interventions%20to%20Prevent%20or%20Reduce%20VAWG%20-%20A%20Systematic%20Review%20of%20Reviews.pdf>

² Health poverty action; Tackling GBV. In Somaliland. <https://www.globalgiving.org/projects/help-tackle-violence-against-women-in-somaliland>

Statistics from the country indicate that 12 per cent of women aged 15-49 had encountered physical violence since the age of 12. At the same time, 6 per cent reported experiencing physical violence in the 12 months preceding the survey. Older women are more likely to experience physical abuse, with one in every four women (25 per cent) aged 40 years and above experiencing violence since the age of 12 and 17 per cent experiencing violence in the same age group the year before the survey.³

In Somaliland, the legal system is a mixture of systems, which comprises statutory law, customary law (Xeer) and Sharia law. Xeer remains the main source of law in Somaliland, particularly in rural and remote areas where government presence is scarce.⁴ Sharia law is not applied in statutory courts, it is integrated into customary law which is also not adhered to strictly. While formal laws define crimes and punishment, their application is continuously negotiated through the customary power dynamics and their upholders. In practice, the primacy of Xeer is accepted and is the most accessible, used and preferred system for dispute resolution. The state also perpetuates the Xeer supremacy when its officers – police, prosecutors and judges – refer cases back to clan elders, who still remain the most powerful force behind justice and access to it.

Sexual Offences Bill has undergone significant changes to become more conservative and discriminatory toward women. Likely due to the heavy pressure exerted by the House of Elders, which seems to have peaked in April 2019, a new bill was drafted to replace the SOB of 2018. An unofficial copy of the text of this newly titled ‘Rape, Fornication, and Other Related Offences’ Bill, was released in September 2019.

Although legislative progress is witnessed, such as the endorsement of the National Gender Policy in 2008 (Somaliland), there is a need for more efforts on the progress being made toward addressing gender-based discrimination.⁵ Also, while significant steps have been taken by drafting and announcing the possibility of adopting the Sexual Offences Bill (SOB), there has been no progress toward integrating the bill into the Somaliland criminal code; thus, implementation has not started.⁶

A growing body of WASH sector evidence points to widespread fear or experiences of GBV while collecting water. The country is currently experiencing drought conditions which will likely increase the burden on women

³ The Somaliland health and demographic survey 2020

⁴ A Policy Paper by the Strategic Initiative for Women in the Horn of Africa (SIHA Network) November 2020. A reflection on gender equality agenda in Somaliland

⁵ Ibid

⁶ Ibid

and girls. For example, women have to walk long distances to access water due to water shortages while girls are out of school as their families cannot afford school fees.⁷

While acknowledging poor access to water, sanitation and hygiene (WASH) is not the root cause of violence but can exacerbate the vulnerability of women and girls to violence. The incidence of GBV in Somaliland is a significant contextual challenge; preliminary assessment of project-related sexual exploitation and abuse (SEA) and sexual harassment (SH) has identified the following project-related risks that need to be addressed in order to mitigate GBV/SEAH risks.

- **Potential abuse of power and sexual exploitation in labour practices:** Hiring and employment practices that seek to increase the number of women in labor-intensive work schemes can expose women to incidents of sexual exploitation, harassment, or violence; for example, when moving about communities and engaging with male leaders (Clan, Faith, and Village Leaders) and community members. Additionally, unequal gender norms and harmful beliefs run the risk of creating hostile environments for female workers. In cases where female workers have less time for traditional gender-related work such as childcare, this can also lead to a potential increase in IPV.
- **Women and girls' exclusion from priority-setting and community decision making processes and related GBV risks:** Exclusion from spaces of voice, agency and decision-making can lead to decisions that further harm or marginalize women and girls. Prioritization that does not take strict gender equality into account, especially in the sector-wide capacity development and mentoring programme in groundwater planning, development and management, might increase their risk to GBV if the capacity needs of qualified female candidates are not correctly assessed.
- **Power asymmetries that can be exploited for personal advantage** can increase barriers to women's participation in capacity development opportunities. Traditionally male-dominated courses where there are gendered stereotypes about females may still be reinforced.
- **Potential amplification of community and household tensions because of poorly designed water points which are insensitive to gender dynamics in a given context can exacerbate exposure to sexual exploitation and other forms of gender-based violence (GBV).** For example, where women and children queue for extended periods at water points can lead to fights with other service users, particularly where pastoralists, refugees or other displaced people are accessing water previously only used by the host community. Also, gender inequitable household dynamics can increase the risk of violence and harm at home for women, girls and other vulnerable groups directly or indirectly participating in the project.

⁷ CARE international (2021) 10 years after Somalia Famine. <https://www.care-international.org/news/press-releases/10-years-after-somalia-famine-country-is-once-again-on-the-brink-of-crisis-with-women-and-girls-hardest-hit>

- **Women and girls can face high risks related to limitations on their mobility.** For example, remote construction contracts might include women who travel to live in or around the project sites, who are potentially highly vulnerable because of their lack of a local support network, and exploitation and harm from non-partner individuals, including armed groups/forces/individuals. Also, lack of access to water may contribute to tensions between husband and wife, particularly in water-scarce or drought-affected areas, which can lead to violence.
- **Community conflict resolution approaches can lead to more harm against survivors who report GBV/SEAH experiences.** Community or local governance resolution processes might reinforce gender inequality by pushing for resolutions that widen inequalities that are not survivor-centred—leading to impunity and more harm to a survivor (through marriage to a perpetrator, re-victimization or other consequences).

EXISTING RISK MANAGEMENT SYSTEMS / GAPS

Drawing lessons from Biyoole project now known as Barwaaqo Project, the groundwater project will establish a basic foundation with several measures to ensure the protection of people and communities it works with, including mechanisms to limit, report and follow up on potential cases of SEA and SH cases as outlined below: -

a) Code of Conduct

The project will ensure a code of conduct is developed and all the recruited project workers will be required to undergo training to understand the content and sign the code of conduct that clearly outlines prohibited behaviours, including SEAH which is unacceptable in the project sites. The CoC sensitization for the project workers will be incorporated into GBV risk management training by the GBV Specialist in Somaliland. The code of conduct will adhere to the guidelines in the LMP.

All contractors must ensure all workers sign a Code of Conduct (CoC) that specifies behavioural conduct, responsibility and penalties. The CoC will be translated and explained to workers in languages that they understand. There is a need to reinforce the CoC, particularly training on SEAH provisions to both direct and contracted workers so that they are aware and the CoC is translated into Somali language.

b) Referral pathways

Help-seeking referral pathways for survivors of GBV exist and have been established in all the districts in Somaliland. However, there is a need to develop and integrate referral pathways into project management in order

to inform the project workers and community members on the available services for GBV survivors such as medical and psychosocial support, safety and security, legal and health interventions. There is also a need to develop and disseminate formal reporting procedures specific for specific districts and locations by updating the GBV referral pathways in collaboration with different ministries and relevant agencies providing GBV services, providing relevant training for the project workers, and informing communities on where to seek services whenever appropriate.

c) Grievance Redress Mechanism

The project will establish a Grievance Mechanism (GM) that handles complaints and feedback from all stakeholders involved. Consultations with communities (particularly with women, girls and people living with disabilities) will be done to determine the preferred alternative to in-person complaints (e.g., phone, online, other). Also, information about GBV/SEAH will be shared with the groundwater employees on where complaints of SEAH can be made and services available with an emphasis on the confidentiality and anonymity of the process will be made. The project GM will adapt learnings from another project to strengthen community accountability and identify a range of issues by holding periodic team meetings to discuss workplace concerns.

SEAH entry points will be identified in collaboration with the local community to enable safe and confidential reporting of sexual exploitation and abuse incidents and other forms of GBV/SEAH. Clear procedures and tools for safe, confidential and ethical management of related complaints will be developed by the GBV Specialist at PIU. The identified GM operator/s will also be trained on effective response to cases of GBV/SEAH should they occur.

The project GM will ensure all incidents of SEAH reported through the GM systems that are related to the groundwater project is reported to the Bank within 24 hours and should include information on four key points as indicated below.

1. Demographic data, such as age and gender, the nature of the complaint (what the complainant says in her/his own words),
2. whether the complainant believes the perpetrator was related to the project.
3. Whether they received or were offered referral to services

RELEVANT MITIGATION MEASURES

The project will adopt a robust approach to address potential GBV/SEAH risks as follows;

1. Mapping:

The project will map out GBV service providers in each location for timely referral of GBV survivors to provide relevant services based on survivors' needs will be identified. The PIU staff will all be informed of the actors working in different project locations. While GBV prevention and response service providers exist in Somaliland, the GBV specialist for this project will need to liaise with the GBV AOR as well as the Ministry of Employment, Social Affairs and Family on the existing referral pathways and share with the project teams. The list of service providers will be mapped out before the commencement of any construction activities and will inform on key gaps where remedial measures may be required.

2. Capacity building:

This action plan will focus on building capacity and sensitization of the PIUs, Contractors, Community, and other project stakeholders on the importance of GBV/SEAH-related issues. The training will include an explanation of GBV/SEAH, expectations for behaviour and conduct, sanctions for violations, roles and responsibilities of actors involved, GBV incident report mechanisms, accountability, and referral procedures. The PIU, particularly the GBV Specialist with the supervision of the World Bank, will review training and communications materials, make suggestions if there are gaps, and assess the need for follow-up activities. The sessions will be conducted quarterly.

3. Stakeholders Engagement and Consultations:

The project will conduct regular stakeholder consultations with (different Line ministries, district authorities, GBV service providers, local authorities such as elders, VDCs, and community groups such as women, youth, people with disabilities, minority groups, crop farmers, livestock keepers, seasonal water users, e.g., Pastoralists) to inform them properly about the potential GBV/SEAH risks, project activities including the channels available to seek grievance redressal through project-related grievance mechanisms. GBV service providers, including national organizations, International and relevant government agencies working to respond to GBV, will participate in the consultation. Such consultation will also help build linkages and prepare the project to respond better to the GBV cases. The project will also conduct regular focus group discussions to understand the risks and limiting factors that female staff and community members may experience in their working environment as per the SEP. Also, the project will develop materials for the stakeholders providing information, education, and communication to indicate that the project and/or area is a GBV/SEAH free zone and provide information on GBV response services and where to seek assistance when needed.

4. Contractor responsibilities:

The capacity of contractors to manage the GBV/SEAH risks is an integral part of the action plan. Consequently, the GBV and procurement specialist will ensure SEAH requirements and expectations are incorporated into contractors' and sub-contractors bidding documents. The contractor's SEAH Accountability and Response Framework will be evaluated as part of the bid's evaluation. The PIU will review C-ESMP to verify that appropriate mitigation actions are included and assess the contractor's SEAH Accountability and Response Framework in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV/SEAH prevention and response requirements. This will be monitored on a quarterly basis.

5. Accountability and Response Framework to deal with the GBV/SEAH cases:

The framework will detail how the project will handle allegations of SEAH, procedures to report SEAH allegations internally, a referral pathway to refer survivors to appropriate service providers, and procedures of confidential requirements dealing with the cases will be strengthened. The GBV Specialist will develop a Standard operating procedure and response protocol to guide how to handle complaints from intake to response to ensure timely and safe reporting of SEAH incidents will be created. The GBV/Social Specialist will ensure beneficiaries and communities are informed of the availability of varying reporting channels for allegations related to GBV/SEAH. This will be made explicit in all community awareness sessions and be part of the publicly disclosed information. The accountability and response framework needs to be in place before the commencement of any construction activities and sensitization to the community will be done on a regular basis.

6. Grievance Mechanism:

The project will establish an effective grievance mechanism (GM) with a separate channel to manage GBV/SEAH related incidence to enable reporting in a safe, confidential survivor-centric manner. An information-sharing protocol will be developed by the GBV Advisor to make the GM more responsive to SEAH and GBV issues so that survivor-related information is carefully managed, and confidentiality is maintained. In addition, The GBV specialist will conduct awareness campaign and develop IEC materials on GM for the communities and stakeholders using easily accessible methods.

7. Monitoring and Evaluation:

The project will develop a comprehensive M&E plan and conduct periodic monitoring and evaluation of the implementation plan, including reporting on the indicator progress.

Action Plan

Outputs	Activity to Address SEAH risk	Steps to be taken	Timelines	Responsible	Collaborating actors /relevant ministries	Output indicators	Estimated Budgets (USD)/Per year
1. Define and reinforce GBV/SEAH requirements in procurement processes and contracts	1.1. Incorporate GBV/SEAH Requirements and expectations in the contractor and consultants' contracts.	<ul style="list-style-type: none"> Ensure that GBV/SEAH issues are incorporated in all contracts signed by contractors and consultants 	Before project activities begin	MoWRD/PIU	MoWRD / World Bank	GBV/SEASH standards in procurement/contract document	N/A (activity to be done by the Procurement /GBV Specialists)
	1.2. Allocation of funds for GBV/SEAH related costs in procurement documents.	<ul style="list-style-type: none"> Clearly define SEAH requirements and expectations in the bidding documents Evaluate the contractor's SEAH Accountability and Response Framework in the C-ESMP and confirm prior to finalizing the contract the contractor's ability to meet the project's GBV/SEAH prevention and response requirements. 	<p>During preparation of bid and Contract documents</p> <p>Monitoring on a quarterly basis</p>	MoWRD/PIU	MoWRD / World Bank	<p>Bid documents with clearly defined SEAH requirements</p> <p>Contract documents with clearly defined SEAH clauses/requirements</p>	N/A

2. Review the IA's capacity to prevent and respond to GBV/SEAH	2.1. Recruit Social & GBV Support Specialist with GBV/SEAH specific skills to support implementation and supervision of GBV/SEAH risk management requirements	<ul style="list-style-type: none"> TOR developed Recruit GBV Specialist with GBV/SEAH skills 	Quarter 1 prior to disbursement for activities under Component 1.	MoWRD	MoWRD	A qualified and competent Social & GBV staff recruited	6000
	2.2. Codes of Conduct signed and understood.	<ul style="list-style-type: none"> Define the requirements to be included in the CoC which addresses GBV/SEAH Review CoC for provisions/clauses that guard against GBV/SEAH Have CoCs signed by all those with a physical presence at the project site. Train project-related staff on the behavior obligations under the CoCs. 	During Project implementation	GBV Specialist/ Social Specialist	MoWRD / World Bank	<p>Percentage of workers that have signed a CoC</p> <p>Percentage of workers that have attended CoC training.</p>	1000
	2.3. Conduct GBV/SEAH orientation training for all workers. (Project staffs), contractors and consultants	<ul style="list-style-type: none"> Develop a training plan Develop training materials Conduct training on GBV/SEA risks, responsibilities, and legal/policy requirements Conduct training for project staffs Develop reporting and accountability protocol for managing reported cases 	<p>Quarter 1 and 2 after contract signing</p> <p>Retraining during Project implementation.</p>	PIU GBV, Social Specialist/ community development Specialist	PIU GBV Specialist / World Bank	Number of trainings conducted	2000

	<p>2.3. Develop and establish/review GBV/SEAH response and accountability framework to include Allegation Procedures to report GBV/SEAH incidents and internally for case accountability procedures which should clearly lay out confidentiality requirements for dealing with cases</p>	<ul style="list-style-type: none"> • Develop/review GBV/SEAH Allegation Procedures to report SEAH issues • Inform employees and the community on how to report cases of SEAH, CoC breaches to the GM, and how such cases are handled • Develop mechanisms to hold accountable alleged perpetrators; disciplinary action for violation of the CoC by workers. 	<p>Before construction begins in site specific locations</p> <p>Maintained throughout Project implementation.</p>	Contractor/MoWRD/PIU	MoWRD/PIU	An established and functional accountability framework	Activity to be done by the PIU /GBV, Social Specialist
	<p>2.4. Develop M&E plan</p>	<ul style="list-style-type: none"> • Develop a comprehensive M&E plan to monitor work plan implementation • Promotion of high-level commitment on monitoring the implementation of SEAH action plan in order to supports efforts to provide multi-sectoral support to GBV survivors. • Monitor GBV/SEAH Implementation Plan 	<p>In Quarter 1 after contract signing</p> <p>Maintained throughout Project implementation.</p>	PIU/GBV Specialist	PIU M&E specialist/	M&E framework in place .	Activity to be done by the PIU /GBV Specialist

3. Inform project affected communities about GBV/SEAH risks	3.1 Stakeholder consultations (Line ministries, district authorities, GBV service providers, local authorities such as elders, VDCs, and community groups such as women, youth people with disabilities, minority groups, crop farmers, livestock keepers, seasonal users e.g. pastoralists, etc)	<ul style="list-style-type: none"> Officially inform the stakeholders on the components of the projects and project risks Sensitize the stakeholders on GBV/SEAH risks and where to seek confidential services Prepare field visit reports 	<p>Prior to initiating site-specific construction-related activities.</p> <p>Maintained throughout Project implementation.- Annually</p>	PIU Social/GBV specialist	PIU/ GBV Specialist	Number of stakeholder consultations done	This cost is included in the SEP document
	3.2. Conduct community sensitization with different groups (Farmers, Range management, pastoralist, community health workers) to understand GBV issues and respond effectively	Conduct community sensitization	<p>Before construction begins- site-specific</p> <p>Maintained throughout Project implementation- twice per year</p>	PIU GBV Specialist/ Social specialist	PIU/ GBV Specialist	Number of community meetings conducted	Cost covered under stakeholder consultations
	3.3. Develop relevant IEC materials for community engagements	<ul style="list-style-type: none"> Develop relevant IEC materials translated in local languages of the project location Communications/sensitization posters/materials as part of construction zones IEC materials to include information on GBV response services 	<p>Quarter 1 of contract signing</p> <p>Maintained throughout Project implementation.</p>	PIU GBV& Specialist/ Social specialist	PIU/ GBV Specialist	No and type of GBV/SEA IEC material developed	2000

4. Map out GBV/SEAH prevention and response service providers	4.1. Develop and or/update a multisectoral GBV/SEAH help seeking referral pathway(s)	<ul style="list-style-type: none"> On the basis of mapped GBV prevention and response service providers develop/update a GBV referral list for service providers based on project locations. Develop referral protocols that outlines key requirements for reporting cases if they arise and measures for safe, ethical and survivor centered responses. Identify key gaps where remedial measures may be required Disseminate the referral pathway/list to stakeholders including service providers 	Before construction begins- site-specific Maintained throughout Project implementation	GBV Service Provider, PIU/ GBV Specialist and PIU Social/GBV specialist	Municipalities in strong coordination with Ministries of Gender/Women and Human Rights	Referral pathway developed/updated Number/type of GBV/SEA preventive and response services available. No. of referrals of SEAH incidents to the project GM by other service providers	Activity to be done by the PIU / /Social and GBV Specialist
5. GBV/SEAH sensitive channels for reporting in GM	5.1. Develop/Review/ Strengthen GM for specific GBV/SEAH procedures	<ul style="list-style-type: none"> Undertake internal review of GM for GBV/SEA mitigation Identify and Integrate GBV/SEA entry points within the GM with clear procedures and tools for management of related complaints Develop/review SEA/strengthen GBV Allegation Procedures to report SEAH issues Develop and update disclosure and reporting guidelines / protocol for GBV/ SEAH with a provision for victim protection and assistance. Create reporting pathways that include support systems and accountability mechanisms including how to handle SEAH allegations properly Develop simple, anonymous and confidential tracking system that GM can use to document when they observe/support and refer GBV incidents to service providers. 	Before all construction begins	PIU/ GBV Specialist	MoWRD/ GBV Specialist	GM with GBV/SEA procedure integrated In the GM	(This will be done by the Social & GBV Specialist so no need to cost it)

	5.2. Train GM operators on how to handles GBV/SEAH cases and referrals as defined in the referral pathway.	<ul style="list-style-type: none"> Identify and select GBV/SEAH focal persons within the GM Train the GM operators on GBV/SEAH basics, the referral pathway, reporting and Confidentiality of data 	<p>During Quarter 1 following signing of the works contract</p> <p>Retraining during project implementation- Quarterly</p>	PIU staff/Social/ GBV Specialist	PIU/GBV Specialist	No. of GM operators trained	3000
	5.3. Disseminate information on GBV GM reporting procedures	<ul style="list-style-type: none"> Inform employees and the community on how to report cases of SEAH, CoC breaches to the GM, and how such cases are handled 	Throughout the project- Quarterly	PIU staff/Social/ GBV Specialist	PIU staff/Social/ GBV Specialist	No of sessions held with employees on reporting	N/A (Activity will be done by the Social and GBV Specialist thus no need to cost it)
	5.4. Review GM reports/logs for GBV/SEA sensitivity	<ul style="list-style-type: none"> Review logs for GBV/SEA documentation to ensure it follows standards for documenting GBV/SEA cases 	During project implementation.- Monthly	MoWRD	PIU GBV Specialist/ Social Specialist	Number of GBV/SEA cases documented	N/A (Activity will be done by the GBV Specialist thus no need to cost it)