

# Vanuatu: Pacific Islands Regional Oceanscape Program - First Phase

## Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) Action Plan

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### 1. Purpose

To articulate:

- Risks of sexual exploitation and abuse / sexual harassment (SEA/SH) related to planned project activities.
- Strategies to mitigate and respond to risks of Project-Related SEA/SH.
- Risks of increased sexual exploitation and human trafficking within the fisheries sector.
- Strategies to strengthen institutional capacity for sexual exploitation and human trafficking prevention and detection within fisheries sector.

### 2. Project

#### 2.1. Proposed Development Objective

The Development Objective of the Series of Projects is to strengthen the shared management of selected Pacific Island oceanic and coastal fisheries, and the critical habitats upon which they depend.

The Development Objective of Vanuatu: PROP is to improve access to economic opportunities for fishers and fish workers, increase climate-resilient domestic supply of fish products, and strengthen national capacity and regional collaboration for fisheries management.

#### 2.2. Components

1. Tuna industry domestication.
2. Small-and medium-sized fisheries and aquaculture value chain development.
3. Fisheries governance and institutions' strengthening.
4. Component 4. Project management.

### 3. SEA/SH Risk Assessment

Based on the World Bank SEA/SH Risk Assessment Tool and appraisal-stage analysis, the Project's SEA/SH risk is assessed as Substantial, reflecting the scale of construction activities, labor influx, port-adjacent operations, and the broader country context.

Table 1 provides a summary of risks of SEA/SH within the project.

#### 3.1. Project-Related SEA/SH

SEA/SH risks specific to planned project activities focus on the Project Workers, and specifically where the project activities provide increased opportunities for Project Workers to use:

- Sexual abuse: actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.<sup>1</sup>
- Sexual exploitation: 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

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<sup>1</sup> World Bank (2022). *Good Practice Note: Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Human Development Operations*.

the sexual exploitation of another.<sup>2</sup>

- Sexual harassment: any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature.<sup>3</sup>

### 3.2. Risks of Sexual Exploitation and Human Trafficking Within the Fisheries Sector

While information on human trafficking in the Pacific Region is limited, available information confirms that human trafficking is occurring on industrial fishing vessels. This includes evidence of forced labor, poor labor conditions, and child labor.

Sex work around ports and in transshipment is also reported. This includes women provide sex work to local and foreign seafarers both on the boats and in venues surrounding the port. There are reports of girls, under the age of 18 engaged in transactional sex with seafarers. There are also reports of women exchanging sex for fish.

While better port facilities may increase the fisheries sector, and in doing so increased sex work around maritime facilities and the risks of sexual exploitation and human trafficking in the fisheries sector. These risks are not directly related to the Project activities under Phase 1 which focus on infrastructure.

This Action Plan identifies risks of human trafficking within the fisheries sector and opportunities to strengthen institutional capacity for human trafficking prevention and detection within fisheries sector.

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<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

Table 1 Project-related Risks of SEA/SH

Component	Subcomponent	Project Activities	Project-Related SEA / SH
<b>Component 1:</b> Tuna industry domestication.	1.1. Investing in enabling public infrastructure for tuna industry domestication.	- Design and construction of public facilities.	Sexual exploitation, abuse or harassment by Project Workers during works.
	1.2. Developing a workforce for a national fisheries and seafood industry.	- Design and construction of seafood technology incubator. - Training.	Sexual exploitation, abuse or harassment by Project Workers during works or training.
<b>Component 2:</b> Small- and medium-sized fisheries and aquaculture value chain development.	2.1. Investing in domestic fisheries value chains.	- Training and extension services. - Technical assistance. - Upgrades to Luganville fish market.	Sexual exploitation, abuse or harassment by Project Workers during works or delivery of services.
	2.2. Informing domestic fisheries value chain management and development.	- Capacity building and technical assistance.	Sexual exploitation, abuse or harassment by Project Workers during capacity building or assistance.
	2.3. Aquaculture sector development.	- Upgrading hatcheries facilities. - Start up support and extension services.	Sexual exploitation, abuse or harassment by Project Workers during upgrades or delivery of services.
<b>Component 3:</b> Fisheries governance and institutions' strengthening.	3.1. Vanuatu Fisheries Department Headquarter infrastructures and equipment.	- Design and construction of building.	Sexual exploitation, abuse or harassment by Project Workers during works.
	3.2. Strengthening monitoring, control, and surveillance capacity.	- Observer placement programs. - Stakeholder outreach and public information.	
	3.3. Supporting policy review and updating monitoring, control, and surveillance capacity.	- Policy review.	
<b>Component 4:</b> Project management.	Project Support Team (PST).		Workplace sexual harassment within PST.  Sexual exploitation, abuse or harassment by PST of other Project Workers or project beneficiaries.

While Table 1 summarizes SEA/SH risks by component, the Project's risk pathways vary in practice by activity type (e.g., construction works, training and extension services, technical assistance, and project management functions). The mitigation measures below are therefore organized to reflect this differentiated risk profile,

while remaining aligned with the Project's Codes of Conduct and the survivor-centered GRM pathway.

## 4. Differentiated SEA/SH Risk Pathways and Mitigation by Activity Type

SEA/SH risks under the Project vary by activity type, location, and mode of engagement. Mitigation measures are therefore tailored to the specific risk pathways associated with construction activities, training and extension services, technical assistance, and project management functions, in line with a proportionate, risk-based approach.

### 4.1. Construction and Contractor-Managed Works

**Risk pathways:** Construction activities under Components 1, 2 and 3 involve contractor-managed works, temporary labor influx, interaction between predominantly male workers and surrounding communities, and activities in port-adjacent and market environments. These factors increase risks of sexual harassment, exploitation, and abuse, particularly affecting women and girls in nearby communities, market vendors, and service providers.

**Mitigation measures:** Mandatory Codes of Conduct and SEA/SH induction for all contractor personnel; incorporation of SEA/SH measures into site management arrangements; community awareness in areas adjacent to worksites on expected conduct and reporting channels; and clear consequences for non-compliance consistent with contracts and national law.

### 4.2. Training, Extension Services, and Capacity-Building Activities

**Risk pathways:** Training and extension activities involve direct interaction between project workers, trainers, extension staff, and beneficiaries (including women engaged in fisheries value chains). Risks may arise from power imbalances, repeated contact, travel to remote locations, and one-on-one or small-group engagements.

**Mitigation measures:** Codes of Conduct for trainers/extension workers; induction and refresher training tailored to service delivery settings; clear guidance on appropriate conduct during training and extension activities; and targeted information for female beneficiaries on available GBV services and reporting options.

### 4.3. Technical Assistance and Advisory Services

**Risk pathways:** Technical assistance activities may involve close professional interactions, workshops, travel, and engagement with government counterparts and stakeholders. While overall risk is typically lower than for construction, risks of workplace sexual harassment and abuse of authority may arise.

**Mitigation measures:** Codes of Conduct and SEA/SH awareness for consultants and advisory personnel; clear reporting pathways via the Project GRM; and PST oversight to reinforce compliance with expected standards of conduct.

### 4.4. Project Support Team and Government-Led Activities

**Risk pathways:** Risks include workplace sexual harassment within the PST and inappropriate conduct by PST members toward contractors, consultants, or beneficiaries.

**Mitigation measures:** Mandatory Codes of Conduct and SEA/SH induction for all PST members; internal reporting pathways with confidentiality protections; and disciplinary measures consistent with employment terms and national law.

### 4.5. Port-Adjacent and Market-Based Interactions

**Risk pathways:** Activities in and around ports, fish markets, and maritime facilities may increase interactions between workers, vendors, seafarers, and communities, with heightened risk of exploitation and trafficking-related vulnerabilities in the broader sector context.

**Mitigation measures:** Focused awareness in port and market areas; coordination with local GBV service providers to ensure referral information is known and accessible; and integration of SEA/SH considerations into relevant site-specific management measures.

**Implementation approach:** This differentiated approach ensures mitigation measures are commensurate with the level and nature of risk associated with each activity type and are implemented in coordination with Codes of Conduct and the survivor-centered GRM pathway described below

## 5. Project-Related SEA / SH

The following prevention and response measures apply across the Project, with emphasis and delivery methods tailored to the activity type and context.

### 5.1. Risk Mitigation (Prevention)

#### 5.1.1. All Components

All Project Workers are required to:

- Sign a Code of Conduct that specifically prohibits SEA / SH.
- Complete an induction session on the SEA / SH.

#### 5.1.2. Component 1, 2, and 3

Awareness will be conducted with communities where civil works are occurring on:

- The Code of Conduct, and expectations related to SEA/SH of Project Workers.
- How to make a report related to SEA/SH by Project Workers.
- Specialist gender-based violence services available.

#### 5.1.3. Component 2

During extension services, information will be provided to female beneficiaries on available GBV services.

### 5.2. Risk Response

The project will establish a pathway in the Grievance Redress Mechanism (GRM) to receive and respond to cases of GBV, both Project-Related and reports that are made to the project that are not Project-Related.

The Project GRM will ensure the survivor’s safety, rights, needs, and wishes will be prioritized. This means:

<b>Safety</b>	Nothing will happen that puts the survivor at further risk of harassment, violence or retaliation by the alleged perpetrator or anyone else.
<b>Choice</b>	The survivor will choose what happens and be involved in decision-making including what action(s) are taken and what information about the incident is shared.
<b>Consent</b>	The survivor will provide consent at each stage of the complaint handling process.
<b>Confidentiality</b>	The survivor’s privacy and confidentiality will be protected including that all information that is captured about the incident will be kept confidential.
<b>Informed</b>	The survivor will be provided comprehensive information so that they know what is happening and what will happen at each stage of the process.
<b>Supported</b>	The survivor will be referred to and supported to access specialist services to assist in their recovery including accessing police, court, health, and social services.
<b>Respect</b>	The survivor will be always treated with dignity and respect.
<b>Non-discrimination</b>	The process will not discriminate based on sex, age, race/ethnicity, ability, sexual orientation or gender identity, or other characteristics.

In addition to applying a survivor-centered approach, to uphold the rights of the survivor and alleged

perpetrator, the resolution of reports of incidents GBV, including SEA / SH, will be:

- Easy to access.
- Flexible to the specific needs of the survivor.
- Transparent with possible outcomes clearly explained and those involved will be kept informed of the progress of the report and the reasons for any decisions.
- Timely with an investigation into an incident commencing within 48 hours of the report and be resolved within 2 weeks, unless there are exceptional circumstances.
- Fair with decision-makers who do not have perceived or actual bias toward those involved in the report, particularly toward the alleged perpetrator or the victim / survivor.

The Project will follow this process when receiving and responding to complaints of SEA/SH:

<p><b>Receive</b> complaints of GBV, including SEA / SH</p>	<p>Complaints of SEA / SH can be reported:</p> <ul style="list-style-type: none"> <li>• Through the existing channels of the GRM.</li> </ul> <p>The person who receives the complaint will:</p> <ul style="list-style-type: none"> <li>• Tell the survivor about the closest GBV service providers including justice, health, safe accommodation and / or counseling.</li> <li>• Document and register the complaint.</li> <li>• Explain the GRM complaints and reporting process to the survivor.</li> </ul> <p>If the survivor chooses to make a formal complaint to the project, the person who received the complaint will communicate the allegation to the PMU E&amp;S Officer within 24 hours of receiving the complaint.</p>
<p><b>Assess</b> if the allegation is likely linked to the project</p>	<p>The PMU E&amp;S Officer will determine the likelihood of the allegation being linked to the project.</p> <p>If the allegation is determined to be likely linked to the project PMU E&amp;S Officer will inform the Project Manager who is responsible for reporting to the World Bank within 48 hours of the determination with only the following data to be shared:</p> <ul style="list-style-type: none"> <li>• The nature of the allegation.</li> <li>• If the alleged perpetrator is, to the survivor’s best knowledge, associated with the Project (yes/no).</li> <li>• The survivor’s age and/or sex (if available).</li> <li>• If the survivor was referred to services.</li> </ul>
<p><b>Verify</b> if the incident likely occurred</p>	<p>If an allegation is determined to be likely to be linked to the project, PMU E&amp;S Officer will determine the likelihood that the incident occurred by interviewing all the people involved.</p> <p>If it is determined that it was likely that the incident to occurred, disciplinary measures, that is proportional to the nature and severity of the incident, toward the alleged perpetrator should then be agreed and communicated to the individual’s employer.</p>
<p><b>Act</b> by taking disciplinary action</p>	<p>The employer of the perpetrator will implement the recommended disciplinary action in accordance with local legislation, the employment contract and the Code of Conduct.</p> <p>Once it is confirmed that disciplinary action has been taken by the employer of the perpetrator the case is resolved.</p>
<p><b>Document</b> the complaint and outcome</p>	<p>Each individual complaint of SEA / SH or child abuse will be documented and registered.</p> <p>The PMU E&amp;S Officer will compile numerical quarterly reports with no identifying information.</p> <p>All complaint records will be stored in a confidential and secure location.</p>

<p><b>Communicate</b> with the survivor</p>	<p>The survivor will be provided ongoing feedback on the development and outcome of their case but especially when:</p> <ul style="list-style-type: none"> <li>• The complaint is received.</li> <li>• The case is escalated.</li> <li>• The verification process commences or when a determination is made that there is an insufficient basis to proceed.</li> <li>• The outcome of the verification process and any disciplinary action.</li> <li>• When disciplinary action has been.</li> </ul>
<p><b>Training</b> for those receiving and resolving complaints</p>	<p>Anyone receiving or handling complaints of GBV will receive training so that they do not revictimize and retraumatize survivors or unintentionally cause them harm.</p> <p>Those who have been identified to receive complaints of GBV will complete training to:</p> <ul style="list-style-type: none"> <li>• Understand the gendered nature of SEA / SH, child abuse, the GBV requirements in the Code of Conduct and the GBV pathway in the GM.</li> <li>• Have the skills to receive complaints of GBV.</li> </ul> <p>Those tasked with resolving incidents of SEA / SH and child abuse will also complete training to develop their skills to receive, resolve and record complaints of GBV.</p>

## 6. Risks of SEA/SH in Tourism

## 7. Risks of Sexual Exploitation and Human Trafficking Within the Fisheries Sector

### 7.1.1. Component 3

Support the implementation of Vanuatu's National Action Plan on Human Trafficking by:

- Training of observers in human trafficking detection.
- Developing standard operating procedures for maritime facilities on human trafficking prevention and detection.

## 8. Implementation

The PMU E&S Officer will lead the implementation of this Action Plan with support, through training and mentoring, by the World Bank. To support consistent implementation of SEA/SH prevention and response measures, a Contractor SEA/SH Compliance Checklist has been developed and is included as an annex to this Action Plan. The checklist translates the requirements of this Action Plan, the Project Codes of Conduct, and the Environmental and Social Commitment Plan (ESCP) into practical, verifiable actions to be applied by contractors and subcontractors prior to mobilization and throughout Project implementation.

## 9. Actions

The actions outlined below are operationalized for contractors through the Contractor SEA/SH Compliance Checklist provided in Annex A.

Component	Subcomponent	Project Activities	Responsibility	Oversight
<b>Component 1:</b> Tuna industry domestication.	1.1. Investing in enabling public infrastructure for tuna industry domestication.	a) All <b>contractors</b> Project Workers sign code of conduct.		
		b) All <b>contractors</b> Project Workers complete induction on code of conduct.		
		c) Awareness conducted with <b>communities</b> where works are occurring.		
	1.2. Developing a workforce for a national fisheries and seafood industry.	a) All <b>contractors</b> Project Workers sign code of conduct.		
		b) All <b>contractors</b> Project Workers complete induction on code of conduct.		
		c) Awareness conducted with <b>communities</b> where works are occurring.		
d) All <b>trainers</b> sign code of conduct.				
<b>Component 2:</b> Small- and medium-sized fisheries and aquaculture value chain development.	2.1. Investing in domestic fisheries value chains.	a) All <b>trainers</b> sign code of conduct.		
		b) All <b>extension workers</b> sign code of conduct.		
		c) All <b>extension workers</b> complete induction on code of conduct.		
		d) All <b>contractors</b> Project Workers sign code of conduct.		
		e) All <b>contractors</b> Project Workers complete induction on code of conduct.		
		f) Awareness conducted with <b>communities</b> and market vendors where works are occurring.		

Component	Subcomponent	Project Activities	Responsibility	Oversight	
	2.2. Informing domestic fisheries value chain management and development.	a) All <b>trainers</b> sign code of conduct.			
		b) All <b>consultants</b> sign code of conduct.			
	2.3. Aquaculture sector development.	a) All <b>contractors</b> Project Workers sign code of conduct.			
		b) All <b>contractors</b> Project Workers complete induction on code of conduct.			
		c) Awareness conducted with <b>communities</b> and market vendors where works are occurring.			
		d) All <b>extension workers</b> sign code of conduct.			
		e) All <b>extension workers</b> complete induction on code of conduct.			
	<b>Component 3:</b> Fisheries governance and institutions' strengthening.	3.1. Vanuatu Fisheries Department Headquarter infrastructures and equipment.	a) All <b>contractors</b> Project Workers sign code of conduct.		
			b) All <b>contractors</b> Project Workers complete induction on code of conduct.		
			c) Awareness conducted with <b>communities</b> where works are occurring.		
3.2. Strengthening monitoring, control, and surveillance capacity.		a) Training of observers in human trafficking detection.			
3.3. Supporting policy review and updating monitoring, control, and surveillance capacity.		a) Developing standard operating procedures for maritime facilities on human trafficking prevention and detection.			
<b>Component 4:</b> Project management.		PST.	a) All <b>PST</b> members sign code of conduct.		
	b) All <b>PST</b> members complete induction on code of conduct.				

## Annex A: Contractor SEA/SH Compliance Checklist

### Vanuatu: Pacific Islands Regional Oceanscape Program – First Phase (P513248)

This Annex provides a Contractor SEA/SH Compliance Checklist to support the implementation of the Vanuatu: Pacific Islands Regional Oceanscape Program – First Phase SEA/SH Action Plan. The checklist is intended for use by contractors and subcontractors to verify compliance with SEA/SH prevention, reporting, and response requirements prior to mobilization, during construction and operations, and throughout contract execution.

Compliance with this checklist is mandatory and forms part of contractual obligations under the Project. The checklist shall be used by contractors for internal compliance monitoring and by the Project Support Team (PST) and the World Bank for supervision and verification purposes.

This checklist does not introduce new requirements. It operationalizes the commitments set out in the SEA/SH Action Plan, the Project Codes of Conduct, the Grievance Redress Mechanism, and the Environmental and Social Commitment Plan (ESCP). In the event of any inconsistency, the ESCP shall prevail.

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#### A. Pre-Mobilization Requirements (Before Works Begin)

##### Codes of Conduct

- All contractor personnel (including subcontractors) have signed the Project Code of Conduct prohibiting SEA/SH.
- Signed Codes of Conduct are retained on file and available for inspection.

##### SEA/SH Induction Training

- All contractor personnel have completed SEA/SH induction training prior to mobilization.
- Training covers:
  - prohibited behaviors (SEA/SH),
  - consequences of violations,
  - survivor-centered principles,
  - reporting channels.

##### Contractor Environmental and Social Management Plan (CESMP)

- SEA/SH mitigation measures are incorporated into the CESMP.
- CESMP has been submitted to and cleared by the Project Support Team (PST) and the World Bank.

##### Grievance Information Prepared

- SEA/SH reporting channels and GRM information are prepared for display at worksites.
- Referral information for local GBV service providers is available.

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#### B. Site Setup and Mobilization

##### Worksite Information Display

- Codes of Conduct are visibly displayed at all worksites.
- SEA/SH reporting information (including confidential channels) is displayed in accessible locations.

##### Community Awareness

- Community awareness sessions have been conducted in areas adjacent to worksites.
- Awareness covers:
  - expected conduct of workers,
  - zero tolerance for SEA/SH,
  - how to report concerns safely.

#### Worker Records

- Attendance records for SEA/SH inductions are maintained.
  - New workers receive SEA/SH induction prior to starting work.
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### C. During Construction and Operations

#### Ongoing Compliance

- SEA/SH obligations are reinforced through toolbox talks or refresher sessions as needed.
- Supervisors actively monitor worker conduct.

#### Reporting and Response

- Any SEA/SH allegation is immediately reported to the PST E&S Officer through agreed channels.
- Contractors cooperate fully with survivor-centered response procedures.
- No retaliation against complainants or survivors is tolerated.

#### Disciplinary Action

- Where SEA/SH violations are confirmed, disciplinary actions are applied promptly in accordance with:
    - employment contracts,
    - the Code of Conduct,
    - national law.
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### D. Coordination with the Project GRM

#### GRM Integration

- Contractors understand that SEA/SH complaints are managed through the Project GRM.
- Contractors do not attempt to independently investigate SEA/SH cases.
- Survivor confidentiality is strictly maintained at all times.

#### World Bank Notification

- Project-related SEA/SH incidents are reported by the PST to the World Bank within required timeframes.
  - Contractors provide necessary factual information without identifying details.
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### E. Subcontractors and Third Parties

#### Flow-Down Requirements

- All SEA/SH requirements apply equally to subcontractors.

- Subcontractor compliance is monitored by the main contractor.

**Training Coverage**

- Subcontractor personnel receive the same SEA/SH induction and awareness training.
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**F. Records and Monitoring**

**Documentation**

- Records are maintained for:
  - signed Codes of Conduct,
  - training attendance,
  - awareness activities,
  - any reported incidents (non-identifying).

**Supervision and Audits**

- Contractor cooperates with PST and World Bank supervision on SEA/SH compliance.
  - Non-compliance findings are addressed promptly.
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**Contractor Declaration**

I confirm that the above SEA/SH compliance requirements have been met and will be maintained throughout Project implementation.

**Contractor Name:** \_\_\_\_\_

**Authorized Representative:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_