



STAKEHOLDER ENGAGEMENT PLAN

Vanuatu Affordable Resilient Settlements (VARs) Project

WASTE DISPOSAL SUBPROJECT

October 2023

OCTOBER 2023

Republic of Vanuatu: Vanuatu Affordable and Resilient Settlements (VARs) Project

Financed by:

The World Bank

Document History

Rev	Description	Originated	Checked	Reviewed	Authorised	Date
1	1 st draft	Carol Dover	Henry Vira	Lawrie Carlson	Rebekah Ramsay	23 Oct 2023
2	2 nd draft	Carol Dover		Lawrie Carlson	Rebekah Ramsay	07 Nov 2023
3	2 nd draft	Carol Dover		Mohamed Ghani Razaak	Mohamed Ghani Razaak	08 Feb 2024
4						

Contents

1. Introduction	1
2. Objectives.....	1
3. Principles for Effective Stakeholder Engagement.....	1
4. Stakeholder Engagement Considerations.....	2
5. Waste Disposal Subproject Key Stakeholders.....	3
6. Community Liaison Committees (CLCs)	4
7. Stakeholder Engagement Implementation Plan	5
8. Grievance Mechanism/Help Desk.....	6
Annex A. Community Liaison Committee Meeting.....	12
ANNEX B. Code of Conduct	14

1. Introduction

This document is the Vanuatu Affordable & Resilient Settlements (VARS) Stakeholder Engagement Plan (SEP), developed specifically for the Component 2 Waste Removal and Site Clearance sub-project. The Waste Removal sub-project will go out to tender in Q4 2023, with the intention to commence waste removal and site clearance in the target settlements of Ohlen Mataso, Anamburu, Seaside and Tokyo. The current plan of works will see waste removal activities commence before the end of the calendar year, with waste disposal targeted for completion 3 months after commencement.

This VARS SEP is guided by the project Social Engagement Framework (SEF) and will be updated as required to form part of the overall VARS project Stakeholder Engagement Plan. The SEF is required under the World Bank's Environmental and Social Framework (ESF), particularly Environmental and Social Standard 10 on Stakeholder Engagement and Information Disclosure (ESS10).

The SEP is designed to outline the approach for how the Waste Disposal subproject will provide stakeholders with opportunities to express their views on potential social and environmental risks and impacts and to propose mitigation measures to be adopted by the project during implementation.

Key stakeholders for the waste disposal subproject include (i) the four (4) target communities, each represented by their Community Liaison Committee (CLC), (ii) the Port Vila City Council (PVCC) and (iii) the Department of Environmental Protection and Conservation (DEPC), who will both support community awareness on waste collection and resource recovery, and (iv) the Ministry of Lands and Natural Resources (MOLNR) as the Implementing Agency.

2. Objectives

The overall objective of Stakeholder Engagement in VARS project is to provide a coordinated process in which public information disclosure and consultation of project activities are communicated transparently. Furthermore, this process adds value to making the relationship between project proponents, project implementers and beneficiaries meaningful.

Stakeholder engagement will continue throughout the life of the Waste Disposal Subproject and will include formal, scheduled CLC meetings as well other means of communication including handouts and community sign boards. The stakeholder engagement process has three key objectives:

- Early and ongoing engagement activities with the local urban, ward council authorities and the selected settlement communities.
- Provide information on the Subproject and obtain feedback on experiences and outcomes of the activities.
- Disclose the Grievances Mechanism (GM) to address any public complaints during the implementation of the subproject.

3. Principles for Effective Stakeholder Engagement

Stakeholder Engagement will be informed by a set of principles and core values underpinning all interactions with stakeholders. VARS will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* public consultations for the project components will be arranged during the whole life-cycle, carried out in an open manner, free of external

manipulation, interference, coercion or intimidation;

- *Informed participation and feedback:* information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity:* stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the project components is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly including diverse.

4. Stakeholder Engagement Considerations

Time and resources: It takes time to develop and build trust-based relationships with stakeholders. Relationships with project stakeholders should develop and grow, and these relationships should be nurtured and fostered. Additional stakeholders might be identified that also want to be engaged. No willing stakeholder should be excluded from the engagement and consultation process.

Consultation must manage expectations: Stakeholders can have unrealistically high expectations of benefits that may accrue to them from a project. As such VARs project proponents must be clear from the outset what they can and cannot do, establishing a clear understanding of their roles and responsibilities.

Securing stakeholder participation: Cultural norms and values can prevent stakeholders from freely participating in meetings. Often there are conflicting demands within a community, and it can be challenging for a project to identify stakeholders who are representative of common interests. While remaining neutral, VARs officers must seek to develop an awareness of the local context and power dynamics to help foster effective and meaningful stakeholder engagement. Stakeholder engagement and consultations should be conducted in Bislama, the lingua franca, to ensure that all levels of stakeholders are able to participate in and contribute to discussions.

Consultation fatigue: Stakeholders can easily tire of consultation processes especially when promises are unfulfilled, and their opinions and concerns are not taken into consideration. Often stakeholders feel their lives will not improve through the project and this can lead to consultation meetings being used as an area to voice complaints and grievances about a lack of development or services. This can be avoided by ensuring VARs officers do not undertake consultation for appearances sake, nor make unsupported promises to stakeholders. The stakeholder engagement process is an opportunity to manage expectations, challenge misconceptions, disseminate accurate project information, and gather stakeholder opinions, which are important feedback for project proponents.

Promotion of the Grievance Mechanism: Stakeholder engagement and consultation will consistently be utilized as an opportunity to disclose and educate stakeholders on the project grievance mechanism, which will be referred to as the Help Desk. Stakeholders will be encouraged to contact the Help Desk via phone or email, in person or through community leaders to raise requests for design change, requests for information or to raise complaints or lodge a grievance. Further details on the Help Desk is provided in section 8 of this document.

5. Waste Disposal Subproject Key Stakeholders

To ensure effective and targeted engagement, the Project identifies three core stakeholder categories: affected parties; other interested parties; and vulnerable groups.

A) Settlement Level

Effective and specific engagement at the settlement level is important as settlement residents have been consulted numerous times about the project, without seeing any change in their communities. The SEP seeks to ensure that engagement with settlement residents is timely, culturally sensitive and delivered in an accessible language (Bislama).

In the context of the Waste Disposal Subproject all individuals, heads of households and community leaders are potentially affected by the subproject through;

- Benefits of improved sanitation and a cleaner community environment.
- Negatively impacted through; nuisance of waste disposal, health and safety concerns if waste disposal poorly managed, social impacts if Contractor Personnel do not follow code of conduct, as well as other unforeseen impacts.
- Community Laison Committee members who may face a burden on time or social pressure through their participation on the committee.

B) Port Vila City and National Level

The city and national level stakeholders may not experience direct impacts from the Waste Disposal Subproject. However, they may perceive that their interests are being affected by the Project and/or these are stakeholders who could influence the Project and its implementation in some way.

City and National Stakeholders include:

- **Government departments:** The project will be implemented by MoLNR. MoLNR manages all land-related issues in Vanuatu. The MoLNR will supported and chair the project Steering Committee (SC). The SC will provide strategic oversight and coordination of the project and comprise representatives from relevant line ministries, including the Ministry of Finance and Economic Management, Ministry of Climate Change Adaptation, Meteorology & Geohazards, Ministry of Infrastructure & Public Utilities, Ministry of Internal Affairs (MIA). Department of Urban Affairs and Planning under MIA and National Housing Corporation (NHC) under MOLNR have influence on perceptions of the project and its objectives.
- **Local Authorities:** Port Vila City Council
- **Local businesses:** in particular Recycle Corp
- The mainstream media (print and broadcast media)
- Individuals who interface with social media
- Members of parliament
- Traditional chiefs
- Police
- Faith based organisations
- Non-Governmental organisations
- Gender Based Violence service providers
- General public.

C) Vulnerable Groups

Academic literature and studies of settlement life in Vanuatu¹ indicate that women and girls are the key vulnerable groups in the settlements. The constraints to employment and safety risks for women and girls in informal settlements are often exacerbated by poor infrastructure and limited access to services. The impact of poor water and sanitation falls disproportionately on women, who are predominantly responsible for disposing of household waste and water. This intensifies women's unpaid work burden and exposes them to serious health risks.

The risk of sexual and physical violence in settlement communities is high. The works Contractor must ensure that Contractor personnel adhere to a code of conduct, which will be strictly enforced for the safety and wellbeing of women and girls and other vulnerable groups in the settlement communities.

The VARS Project will establish a Gender-based Violence (GBV) Compliance Team as a support mechanism to the Grievance Mechanism (GM). The GBV Compliance Team will seek the participation of agencies that form Port Vila's referral network for GBV service provision; Vanuatu Women's Centre, Police Family Protection Unit and Department of Women.

The definition of 'Vulnerability' may be extended to a group or persons who may be incapable of understanding the benefits that the subproject is meant to deliver. Vulnerability may include individuals who are not able to attend or participate meaningfully in decisions that affect their well-being. Conversely, their vulnerable status can be exacerbated because of the subproject. A non-exhaustive list of groups considered vulnerable in this subproject include:

- Children
- Elderly
- Persons with disabilities
- Women who are head of household
- Individuals who are illiterate
- Survivors of violence.

In an effort to ensure equal and meaningful representation in Project consultation and decision-making processes, the Project will seek the participation of Vanuatu Society for People with Disability (VSDP) to serve in an advisory capacity on the Community Liaison Committees. VSDP will be asked to work with the Project to ensure that people with disability and their care givers are fully informed of the Project objectives and processes and are able to raise questions, concerns and grievances.

6. Community Liaison Committees (CLCs)

Community Liaison Committees (CLCs) are established in each of the target settlements. For the Waste Disposal Subproject, a pre-start meeting will seek to ensure that settlement residents are fully informed of the subproject objectives and work program, understand the grievance mechanism and expectations for Contractor Code of Conduct. The pre-start meeting will also agree site-specific access restrictions for Contractor use of sanitation facilities, and no-go zones, etc. Refer to Annex A for outline of the CLC meeting agenda. The CLC regular meeting will ensure adequate information sharing amongst the key subproject stakeholders, including settlement residents, Port Vila City Council, Port Vila Town Council of Chiefs, Civil Society, and the MOLNR. Effective management of CLCs will;

¹ Vanuatu Women's Centre. 2020. Violence against young women and girls in Vanuatu: the effectiveness of outreach and prevention strategies, Port Vila, Vanuatu.

UN Women. 2022. Gender Equality Brief for Vanuatu. Port Vila, Vanuatu.

UNFPA. 2018. Young Women's Empowerment and Teenage Pregnancy in the Pacific. Suva, Fiji.

- (i) ensure communities are well informed of the subproject schedule,
- (ii) ensure community preferences are integrated and foundational to the design of infrastructure,
- (iii) ensure all voices and perspectives of the communities (women, elderly, children, disabled, etc) are included in a meaningful and effective way,
- (iv) reduce potential conflicts and tensions,
- (v) garner support for activities,
- (vi) help communities play a role in quality assurance of works,
- (vii) provide a mechanism to disclose the project grievance mechanism.

The terms of reference for the CLCs are attached as Annex B.

7. Stakeholder Engagement Implementation Plan

The Implementation Plan for **the Waste Disposal Subproject** constitutes the following components:

Pre-Works Phase					
Responsible	Activity	Objective	Stakeholders	Medium	Timeframe
Works Contractor with support from the PMU, PVCC, MOLNR	Pre-start meetings	Ensure stakeholders are informed of works program and agree access restrictions for contractor personnel	All identified, especially affected persons and vulnerable groups	-CLC meetings -notice boards -handouts	Once the contractor is on board and prior to start of works
PMU with support from the CLC	Disclose the GM	Ensure stakeholders can access the GM and are informed of expected behaviours of Contractor personnel	All identified, especially affected persons and vulnerable groups	-CLC meetings -GM complaint form and booklet	Prior to start of works
Works Phase					
Responsible	Activity	Objective	Stakeholders	Medium	Timeframe
Works Contractor with support from the PMU, PVCC, MOLNR	On-going consultation for notification of works program	Advise all stakeholders of commencement of works. To review GM processes and provide ongoing consultation.	All identified, especially affected persons and vulnerable groups	-CLC meetings -notice boards -handouts	At least one (1) update meeting held in areas with active works
Works Contractor with support from the PMU, PVCC, MOLNR	Contractor Code of Conduct implemented	Ensure workers adhere to code of conduct	All identified, especially affected persons and vulnerable groups	- CLC meetings -one on one consultations - notice boards	Continuous throughout the works
PMU with support from the CLC	Implement the GM	Ensure communities and individuals can resolve issues	All identified, especially affected persons and vulnerable groups	-CLC meetings -one on one consultations - complaint form and booklet	Continuous throughout the works

*CLC = Contractors Community Liaison Committee, GM = Grievance Mechanism, MOLNR = Ministry of Lands and Natural Resources, PMU = Project Management Unit, PVCC = Port Vila City Council.

8. Grievance Mechanism/Help Desk

The VARS Project Grievance Mechanism (GM) will be referred to in public as the “Help Desk” and will seek to:

- a) respond to requests for information or requests for design change;
- b) resolve complaints; and
- c) address and resolve grievances in a timely, effective and efficient manner that satisfies all parties involved.

Requests for design change and requests for information are not classified as complaints, though they require follow-up and assurance of satisfaction from the affected party. A ‘complaint’ is categorized as an issue that raises concern, worry, or otherwise troubles the affected party or parties. A complaint which is not responded to in a timely or satisfactory manner may escalate into a ‘grievance’. Also, the help desk assessment process may immediately assess issues relating to reports of violence, assault, exploitation, abuse or harassment as a grievance and may enlist support from the Gender-Based Violence Compliance Team.

The Help Desk will provide a transparent and credible process for fair, effective and lasting outcomes. The Help Desk process will seek to build trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. The Help Desk will:

- Provide settlement residents and other interested or affected parties with avenues a) seeking information or requesting a design change, b) raising a complaint or c) resolving any grievance that may arise during the course of the implementation of the Project subcomponents;
- Ensure that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of those requesting information or action; and
- Ensure that the GM is linked with existing referral networks for issues related to gender-based violence, sexual harassment, exploitation or abuse or issues involving children.

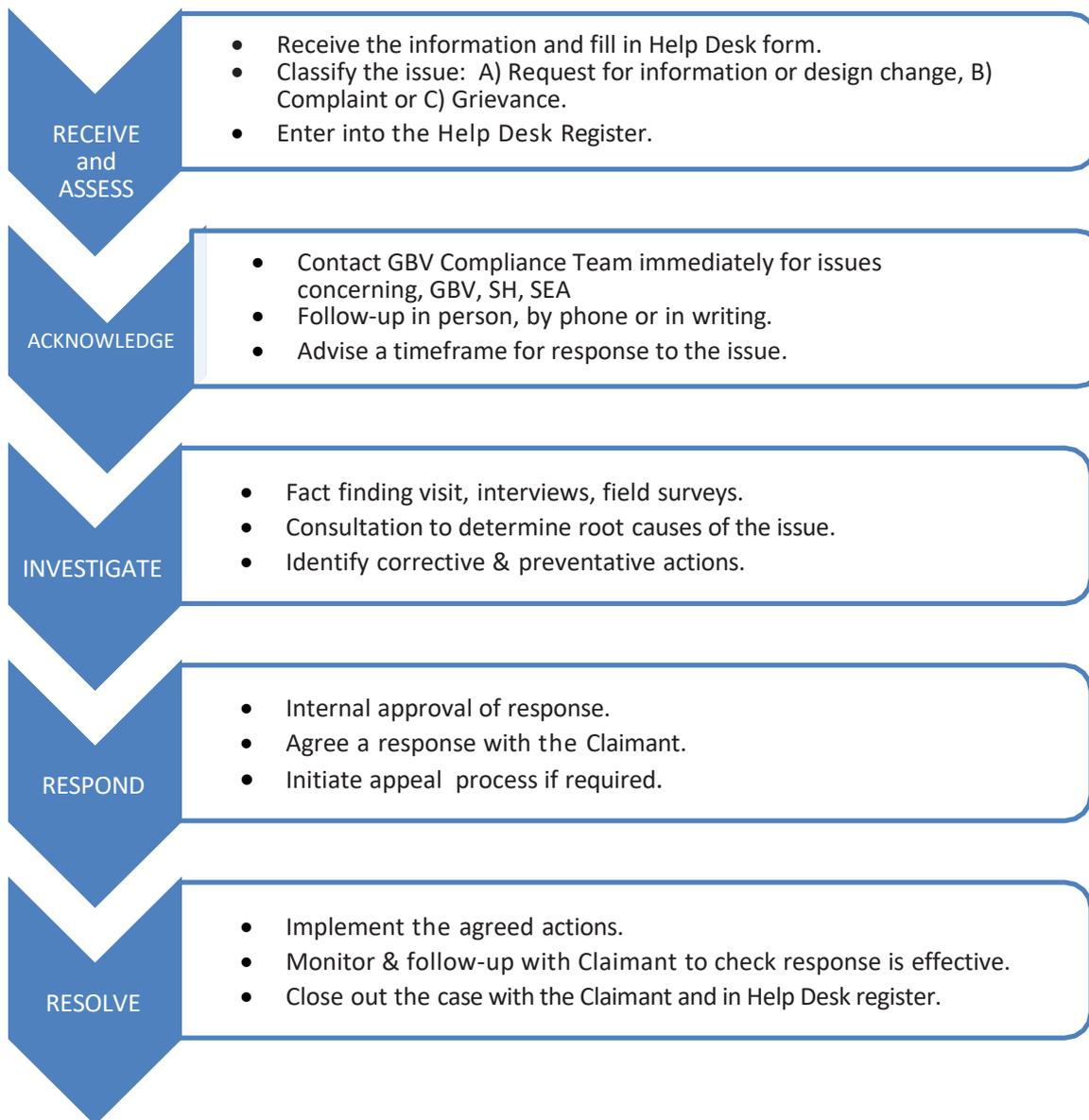
Help Desk Personnel: The PMU operates a Help Desk, with dedicated phone lines for both networks to receive a) requests for information or design change, b) complaints and c) potential grievances. The social team of the PMU consists of the Social Environment Specialist (SES), the Social Development Specialist (SDS) and a Social Officer position. The latter is proposed for procurement in the near future. The social team will be responsible for promoting Help Desk processes (the Grievance Mechanism) through all stakeholder engagement programs. At the same time, the team will manage requests for information, complaints and grievances internally by keeping and managing a Help Desk register. Once on-board, the Social Officer will be responsible for data entry into the Help Desk register and will hold and respond to the Help Desk phone at all times.

Help Desk Process: Help Desk processes will follow five key steps to resolve any requests for information, design change, complaints or grievance that arise. If the concerned party is not satisfied with the outcome of the process handled by the Social Officer, s/he/they can escalate their concern to the Project Manager of the PMU, who will then assign a senior officer to investigate.

The concerned party can elect to raise a request for information or design change, complaint or grievance either through the Help Desk form (see annexed example), phone call, word of mouth or through a third party, such as a community leader, Chief or Church leader. The Help Desk register will record all relevant information regarding the complainant and the issue(s) raised.

Complaints or grievances relating to gender-based violence (GBV), sexual harassment (SH) or sexual exploitation and assault (SEA) that arise from the community against the VARS project will also be recorded (confidentially) in the Help Desk register. However, GBV, SH and SEA complaints may be complex, sensitive and potentially volatile. Therefore, the VARS Social Team will work under the guidance of the GBV Compliance Team to ensure that concerned parties are immediately offered confidential and professional support.

HELP DESK PROCESS:



HELP DESK IMPLEMENTATION TIMEFRAMES

Help Desk implementation process includes five key stages: (i) Receive and Assess; (ii) Acknowledge; (iii) Investigate; (iii) Respond; and (iv) Resolve/Close Out.

The intention is to respond to requests and resolve complaints as quickly as possible so that they do not become a grievance, while recognizing that some issues may be assessed as a grievance on presentation.

(i) Receive and Assess - 1 day

The first point of contact for requests and complaints from settlements will be the PMU Social Officer. However, all members of the PMU will be trained to receive and record requests and complaints or grievances. A Help Desk Registration Form will be completed immediately and shared with the Project Manager the same day, via email if the Project Manager (PM) is not available. In most cases the PM will determine which PMU member will conduct the investigation. The Social Officer will be tasked with entering the Registration Form details into the Help Desk Register. The register will be an Excel database, which will be used to track requests/complaints/grievances through to resolution or close-out.

(ii) Acknowledgement – within 2 days of receipt

Requests/Complaints/Grievances will be acknowledged within two days by a response to the concerned party. If the GBV Compliance Team (GCT) is to be involved, the GCT members will be contacted within 2 days for a meeting to be held within 1 week. The meeting will determine how best to proceed with the issue.

(iii) Investigation – within 1 week of receipt

Investigations may include site visits to determine the scale and impact of the request/complaint/grievance and what options there may be for appropriate responses or resolutions. Investigations should be conducted within 1 week of receipt of the request/complaint/grievance.

(iv) Respond -within 1 week of investigation

The Social Officer, or PMU member assigned by the PM, will communicate the findings of the investigation to the concerned party. The response should be delivered within 1 week of the investigation and include a proposed resolution and seek the approval from the Claimant. If the Claimant is satisfied with the proposed resolution then the request/complaint/grievance is ready to be resolved.

(v) Resolve/Close Out – within 1 month of investigation or as soon as practicable

If the Claimant is satisfied with the proposed resolution and agrees that the issue is resolved, the Claimant will be asked to sign the Help Desk Form and the matter will be considered resolved. The resolution will be recorded in the Help Desk register to reflect that the matter is resolved.

If the Claimant is still dissatisfied with the outcome, they may be referred to the legal process or use the World Bank Grievance Redress System, which is available at any stage to the Claimant. However, courts should be the last avenue for addressing grievances.

If a grievance is dismissed as groundless; the Claimant will be informed of their rights in taking it to the next level. A copy of the decision is to be given to the Claimant in writing and the outcome recorded in the Help Desk Register. A copy of the decision will be shared with the Director of MoLNR.

A request/complaint/grievance is closed out when no further action can be or needs to be taken. All requests/complaints/grievance should be closed out within 1 month or as soon as possible.

The status will be recorded in the Help Desk Register as follows:

- Resolved – a solution has been agreed and implemented and signed documentation is evidence of this.
- Unresolved – it has not been possible to reach an agreed solution and the case has been elevated to

the World Bank Grievance Redress System or the Courts.

- Abandoned – cases where the attempts to contact the Claimant have not been successful for three months following receipt of Help Desk Form.

All requests/complaints/grievance will be reviewed for opportunities to help identify and reduce future, similar occurrences across VARS subprojects.

HELP DESK Form (work with the concerned party to complete the form)

Name	Phone number(s)	Home address/location

QUESTION	RESPONSE
What is the problem?	
What is the cause?	
When did it happen?	
Do you believe the VARs Project is responsible?	
What is your proposed solution?	
ASSESSMENT	
Is this: <ul style="list-style-type: none"> A) a request for information/design change B) a complaint, or C) a grievance 	
Is an investigation required?	

Name of officer receiving or completing this form _____ Date: _____

Investigation Process – Seek a Solution

<p>1. Is there impact to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Housing <input type="checkbox"/> Land <input type="checkbox"/> Business property <input type="checkbox"/> Personal property <input type="checkbox"/> Community property <input type="checkbox"/> Cultural Heritage <input type="checkbox"/> Water Source/Supply <input type="checkbox"/> Electrical issue <input type="checkbox"/> Livestock/crops/trees 	<p>2. Is the issue related to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Dust <input type="checkbox"/> Noise <input type="checkbox"/> Road traffic <input type="checkbox"/> Safety issue <input type="checkbox"/> Environmental concern <input type="checkbox"/> Sexual Harassment <input type="checkbox"/> Sexual Exploitation Assault <input type="checkbox"/> Gender-based Violence <input type="checkbox"/> Non-sexual violence <input type="checkbox"/> Verbal abuse 	<p>3. Who is involved:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Contractor personnel <input type="checkbox"/> MOLNR personnel <input type="checkbox"/> Community member <input type="checkbox"/> Other _____
---	---	---

<p>WHO is Assigned to Follow-up?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Social Officer <input type="checkbox"/> Social Development Specialist <input type="checkbox"/> Social Environment Specialist <input type="checkbox"/> Project Manager <input type="checkbox"/> Contractor <input type="checkbox"/> Other _____ 	<p>WHEN will they follow-up?</p> <ul style="list-style-type: none"> <input type="checkbox"/> Two days <input type="checkbox"/> One week <input type="checkbox"/> One month <input type="checkbox"/> Three months
---	--

Verification of Information	Yes	No	Comments and explanations
Is the issue as described?			
Is the cause as described?			
Is VARS responsible? Why or why not?			
Where does responsibility lay?			
Is the proposed solution appropriate and proportionate to the issue?			
Is corrective action required?			

Name of officer completing the form: _____ Date: _____

Conclusion

Has the issue been resolved to the satisfaction of the concerned party: Yes _____ No _____

If yes, have the concerned party sign here: _____

If no, will the concerned party seek legal advice?

<p>Investigation Officer</p> <p>Signature: _____</p>	<p>VARS Project Manager</p> <p>Signature: _____</p>
--	---

Annex A. Community Liaison Committee Meeting

Proposed Agenda

Note: All CLC meetings are to be conducted in Bislama, with handouts available in Bislama and English. The meetings in relation to the Waste Disposal subproject will include, but not be limited to the following topics:

1. Introductions and greetings

- a. Chairman of the Ward Council of Chiefs
- b. PVCC Representative and/or DEPC Representative
- c. MOLNR Representative
- d. Contractor Representative

2. Key messages for Community Stakeholders

- a. **Overall VARs project introduction**
- b. **Waste Disposal Subproject benefits:**
 - Reduction in solid waste and resultant reduction in vector-borne diseases
 - Increased awareness of proper solid waste management
 - Safer and more sanitary public environment

3. Discuss program of works – Contractor will lead this discussion

- a. When are works starting up?
- b. How will notifications of waste disposal schedule be delivered?
- c. What will be the hours/days of works?

4. Works Contractor to ensure Workers Behaviour

- a. Confirm importance of respectful behaviour and the requirement for good behaviour in the community.
- b. Contractor personnel will be restricted to specific areas of the community to avoid social problems.
- c. Explain the code of conduct for Contractor personnel; restricted access to agreed areas only, personnel to leave the community immediately at the end of each working day, no kava/alcohol/drug use, no disrespectful behaviour, no credit for services such as lunches for Contractor personnel.

5. Site Safety

- a. Agreement on the location of solid waste disposal sites for each community.
- b. Agreement on traffic and foot traffic management around the disposal site.

6. Discuss the Grievance Mechanism (Help Desk) process:

- a. Explain the Help Desk processes.
- b. Introduce the Help Desk Registration Form and explain where, how to complete and submit the form and to whom. Explain response timeframes.
- c. Identify/confirm nominate community representatives who will be main liaison (Chief or Community leader, Church leader, Women's leader, Youth leader)

7. Question and Answer (Q&A):

- a. Provide adequate time to encourage and document discussion; questions and concerns raised by community and stakeholders, note where further response and/or further information is needed, action plan for resolving any issues raised. Note and revisions to works program as a result of community discussion.

ANNEX B. Code of Conduct

FOR ALL SUBPROJECT CONTRACTOR PERSONNEL TO SIGN:

I, _____, agree that while working on the project:

- Follow all the laws of Vanuatu.
- Follow all Contractor occupational health and safety requirements.
- Do not use alcohol or kava or drugs during work time.
- Treat all women and girls, children and men with respect.
- Do not swear at or in front of any community members.
- Do not behave badly towards women and girls in the community. For example, no looking somebody up and down; no kissing, no howling or smacking sounds; no following somebody around; no whistling and catcalls; no giving personal gifts.
- Do not stay in the community after working hours.
- Do not touch or have contact with children (any community members under the age of 18).
- Do not have sex and not try to have sex with members of the communities.
- Consider reporting through the GM or to my manager if I believe a fellow worker is not following this Code of Conduct.

With regard to children under the age of 18:

- Tell my manager if any children are in danger.
- Not pass time alone with any children while in the communities.
- Do not invite any children to leave the communities.
- Do not take any pictures or videos of children in the communities.
- Do not hit or swear or yell at any children in the communities.

I understand that if I breach this Code of Conduct, my employer will take disciplinary action which could include:

1. Informal warning.
2. Formal warning.
3. Additional Training.
4. Loss of up to one week's salary.
5. Suspension of employment (without payment of salary), for a minimum period of 1 month up to a maximum of 6 months.
6. Termination of employment.
7. Report to the Police if warranted.

Signature: _____

Printed Name: _____

Title: _____