



FEDERAL MINISTRY OF EDUCATION



**INNOVATION DEVELOPMENT AND EFFECTIVENESS IN THE  
ACQUISITION OF SKILLS (IDEAS) PROJECT**

**CODE OF CONDUCT  
on  
Gender-Based Violence (GBV) and Sexual Exploitation & Abuse (SEA) and Sexual  
Harassment**

Gender of Respondent

Male ( )

Female ( )

I, \_\_\_\_\_, of ..... (name of firm/organization), acknowledge that preventing Gender-based Violence (GBV) Sexual Exploitation & Abuse (SEA) and Sexual Harassment is important. I understand and acknowledge that GBV/SEA/Sexual Harassment acts constitute acts of gross misconduct and are therefore grounds for sanctions, penalties or termination of employment or contracts. I understand that all forms of GBV/SEA/Sexual Harassment are unacceptable within the training centres, neighbouring project communities, or at Trainers' or Trainees' houses. Prosecution of those who commit GBV/SEA/Sexual Harassment will follow in line with guidance from the IDEAS Project's GRM Manual and in full compliance with applicable laws in Nigeria. I also acknowledge that I shall maintain peaceful relationships and interactions with individuals within and around my place of work as pertains to the IDEAS project.

Specifically, I agree that throughout my engagement under the IDEAS project I will:

- i. Maintain conflict-free relationships with Project Staff/Instructors/Trainees/Site Workers/Stakeholder of the project *when such relationships and interactions become necessary*.
- ii. Consent to police background check if warranted
- iii. Treat women, girls, children (persons under the age of 18), Persons Living with Disability (PLWD), and men with respect regardless of race, colour, language, religion, political affiliations, or disability, birth or other status.

- iv. Not use language or behaviour towards women, girls, children or men that is inappropriate, harassing, abusive, sexually provocative, or demeaning.
- v. Not participate in non-consensual sexual activity with project stakeholders and shall not engage in an sexual activity with a minor including grooming or through digital media (**note: mistaken belief regarding consent or the age of a minor is not a defense**).
- vi. Not engage in sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- vii. Refrain from engaging in any sexual activity with project stakeholders or members of communities surrounding training centers, office locations, or construction sites without full, voluntary, and informed consent from all parties involved. Sexual activity involving a child (anyone under the age of 18) is strictly prohibited under all circumstances and constitutes a serious violation of this Code and national laws. Any form of sexual interaction that involves the use of power, influence, or authority to obtain sex, including offering or withholding employment, training opportunities, grades, favors, or other benefits—is considered sexual exploitation. This includes relationships where sexual favors are exchanged for promises of assistance, money, services, or protection. Such acts are deemed non-consensual and are strictly prohibited within the project.
- viii. Attend and actively partake in training courses related to GBV/SEA/Sexual Harassment as requested by my employer or the IDEAS Project.

I will promptly report any suspected or actual incidents of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), or any breaches of this Code of Conduct, whether committed by a colleague, another project stakeholder, or any individual within the project's area of influence. I will make such reports through the official GRM channels outlined in the Project GRM Manual, or directly to my employer or other designated project authorities.

#### **With regard to Minors (Persons under the age of 18):**

- i. Ensure, wherever possible, that another adult is present when working in close proximity to a minor.
- ii. Not invite unaccompanied minors into my home, except in cases of immediate risk to their safety.
- iii. Not sleep near unsupervised minors unless absolutely necessary, with prior approval from a supervisor and, where possible, the presence of another adult.
- iv. Use digital devices responsibly and never to exploit, harass, or expose minors to inappropriate content, including pornography.
- v. Refrain from using physical punishment or any form of discipline against minors.
- vi. Not engage minors in domestic or other work that is exploitative, hazardous, inappropriate for their age, or that interferes with their education or well-being.

#### **Use of Images for Work-Related Purposes**

When photographing or filming individuals for official IDEAS Project purposes, minors, or community members, I will:

- i. Respect local customs, traditions, and any cultural sensitivities related to photography or filming, particularly involving minors.
- ii. Obtain informed consent from the individual involved. In the case of minors, consent must be obtained from both the minor and their parent or legal guardian. I will clearly explain how the image or video will be used.
- iii. Ensure that all images present individuals in a respectful and dignified manner. Minors must be appropriately dressed, and no individual should be shown in poses that are suggestive or imply vulnerability or submission.

- iv. Ensure that all visual materials reflect the reality and context accurately, without manipulation or misrepresentation.
- v. Avoid sharing or storing image files in ways that could reveal identifying information about any individual—especially minors—when distributing or publishing images electronically.

This CoC is grounded in applicable Nigerian laws, including the Criminal Code Act and Penal Code, the Violence Against Persons (Prohibition) Act, 2015, and the National Industrial Court Civil Procedure Rules, 2017, as well as the Nigerian Constitution (Section 34), which guarantees the right to dignity and protection from degrading treatment. It also aligns with the World Bank's Environmental and Social Standards (ESS2 – Labor and Working Conditions; ESS4 – Community Health and Safety; and ESS10 – Stakeholder Engagement and Information Disclosure).

The following mandatory sanctions shall apply to perpetrators upon confirmation of violating this CoC:

#### **1. Technical Service Provider (TSP) or Contractor Staff**

- Shall be immediately suspended from duty pending investigation.
- Shall face contract termination upon confirmation of misconduct.
- Shall be blacklisted from future engagements on any World Bank or Federal Ministry of Education (FME) project.
- Shall be referred to law enforcement for criminal prosecution in accordance with Nigerian law.
- Breaches shall be formally documented and disclosed (without revealing survivor identity) to serve as deterrents.

#### **2. Trainers or Instructors**

- Shall be immediately removed from training responsibilities.
- Shall face revocation of engagement and may lose teaching credentials, where applicable.
- Shall become ineligible for future involvement in any FME or World Bank-related initiative.
- Shall be reported to relevant regulatory bodies for professional disciplinary action.
- Where criminal liability exists, the offender shall be prosecuted through appropriate legal channels.

#### **3. Trainees**

- Shall be expelled from the program following due process.
- Shall have their certification or entitlements withdrawn.
- Shall be referred to security agencies for investigation and prosecution if legally required.
- In the case of minors, mandatory psychosocial support or rehabilitation shall be facilitated, in accordance with child protection laws.

#### **4. Support Staff (e.g., Cleaners, Security, Administrative Aides, Others) or Site Workers**

- Shall be immediately dismissed from all duties.
- Shall face contract termination, particularly for outsourced personnel.
- Shall be reported to employers and/or law enforcement authorities depending on the offense severity.
- Shall be barred from future employment in any World Bank or FME-supported project.

#### **5. National Project Coordination Unit (NPCU) Staff / Consultant**

- Shall be suspended and dismissed following confirmed violations.

- Where abuse of office, extortion, or coercion is involved, staff shall be referred to judicial or anti-corruption authorities.
- Offending personnel shall be permanently disqualified from involvement in any current or future World Bank-supported operations.

*I understand that it is my responsibility to use common sense and avoid actions or behaviour that could be construed as GBV or SEA or breach this code of conduct. I do hereby acknowledge that I have read the GBV Code of Conduct, do agree to comply with the standards contained therein and understand my roles and responsibilities to prevent and respond to GBV and SEA. I understand that any action inconsistent with this GBV Code of Conduct or failure to take action mandated by this Code may result in disciplinary action and may affect my ongoing employment.*

Please tick the option that applies to you:

NPCU	<input type="checkbox"/>
Consultant	<input type="checkbox"/>
TSP Management	<input type="checkbox"/>
Instructor	<input type="checkbox"/>
Trainee	<input type="checkbox"/>
Contractor	<input type="checkbox"/>
Site Worker	<input type="checkbox"/>
Others	<input type="checkbox"/>

Signed by \_\_\_\_\_  
 (Staff/Trainee/Worker)

Title: \_\_\_\_\_

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

Head of  
 Organization \_\_\_\_\_

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

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