



Simplified Approval Process

Annex 12: Environmental and Social Action Plan (ESAP)

WATER_RES Enhancing the ability to address the risks of water scarcity in areas most affected by climate change and water shortage in Syria

Acted, Syria, March 30, 2026



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1. Introduction

The Environmental and Social Action Plan (ESAP) is a tool for managing environmental and social risks in the project- Enhancing the ability to address the risks of water scarcity in areas most affected by climate change and water shortage in Syria (henceforward the Project). The action plan is aligned with Acted's Environmental and Social Policy and complies with the Green Climate Fund's eight Performance Standards and the Revised Environmental and Social Policy (ESP). Through this approach, ESAP provides safeguards and accountability measures to guide implementation and reinforce the adoption of the interim IFC performance indicators.

As a core component of the funding proposal and project implementation, the ESAP will be continuously monitored and reported on throughout the duration of the project.

2. Environmental and social policies and regulatory requirements

2.1 National environmental regulatory framework

The foundational law on water resources in Syria is **Water Legislation Law No. 31** from 2005 and related amendments and executive instructions. It regulates the use and protection of water resources, including for domestic, agricultural and industrial purposes and related licensing. It does not include incentives to encourage water users to register their wells. However, unlicensed wells are subject to fines and criminal penalties, and ultimately illegal wells can be backfilled or destroyed. The recent amendments strengthened enforcement and penalties for illegal well drilling. However, the implementation of these measures remains weak due to the recent conflict and ongoing fragmentation of the country. The law requires the installation of meters to measure quantities of water extracted from wells. However, while there is some monitoring of meters' validity and the safety of their operations, it is not performed in a regular or periodic manner. Tempering of meter readings is subject to fines, criminal penalties and revocation of licenses. Additionally, the law covers registration and participation in Water Users Associations, which have various functions including developing programs and settling disputes.

Relatedly, **Legislative decree No. 29 from 2012 on agricultural land reclamation** set the responsibility of the supervising ministry for minimum and maximum water quotas for reclaimed irrigated lands. This includes monitoring of distribution and use. Furthermore, **Law No. 10 of 2023** establishes a fund to finance the National Project for Transition to Modern Irrigation, mandating a shift to modern irrigation methods in specified areas and providing grants and loans for this purpose.

Both Law No.31 and decree No. 29 are currently being revised and consolidated into a single legislature considering **Presidential Decree No. 155 of 2025**, creating Ministry of Energy that merges Ministry of Oil and Mineral Resources, Ministry of Electricity, and Ministry of Water Resources. The decree No. 155 allocated oversight over all water resources, including for irrigation, to the General Commission for Water Resources hosted seated at the Ministry of Energy. The project will leverage this institutional reform to support integrated water-land planning, ensuring that reclaimed land, agricultural water use, and community-based interventions are aligned with water availability, efficiency, and long-term water security strategies.

Resolution No. 629 of 2007 established basin management committees in every governorate responsible for addressing environmental degradation, water pollution and water deficit problems in coordination with the local authorities to rationalize the use of water and water consumption in irrigation. The basin committee for Barada and Awaj is currently not active. However, in case the committee would be re-activated, the project will be adjusted to collaborate closely with it,



providing data, technical inputs, and decision-support tools to enhance water allocation, monitoring, and dispute resolution at the basin level.

The **Environmental protection law, law No.12**, came into force in 2012. This law, consisting of 26 articles across five chapters, establishes the fundamental rules for environmental protection, pollution prevention, and sustainable development, including related to water resources. It further defines the Ministry of Environment's responsibilities (*note: currently Ministry of Local Affairs and Environment*) in implementing these provisions. It assigned the Ministry a wide range of duties, including setting national environmental policy and strategies, preparing legislation, monitoring environmental conditions, conducting research, regulating industries with environmental impacts, managing hazardous substances and waste, overseeing environmental assessments, and promoting biodiversity, environmental awareness, and civil society engagement. Additionally, it authorized environmental inspectors with enforcement powers, specified penalties for environmental violations such as improper waste disposal or handling hazardous materials, provides tax incentives for environmentally beneficial activities, and exempts certain environmental awareness efforts from advertising fees. The project supports the law by incorporating evidence-based environmental monitoring, minimizing infrastructure impacts, reducing leakage, and preventing pollution.

Although the project is a Category C project and does not require a full Environmental Impact Assessment under **Ministerial Decree No. 225 of 2008**, environmental safeguards are integrated through infrastructure maintenance, safe greywater reuse, and community awareness programs.

Project activities under Components 1 and 2 will ensure compliance with **Approved Standards No. 45 of 2007** related to key parameters and limits for drinking water quality while Components 2 and 3 will ensure compliance with **Approved Standard No. 2752 of 2008** concerned with the use of treated water in irrigating crops, **Approved Standard No. 3474 of 2009** related to disposal of treated water in watershed. While not directly linked to the proposed project activities, the project will also take note and ensure awareness of **Approved Standard No. 2580 of 2008** concerned with release of treated industrial water in the general sewage network, and **Approved Standard No. 2665 of 2002** related to safe use of permitted waste resulting from wastewater treatment plants.

In addition, while all project activities under Component 3 will work exclusively with and through public nurseries and extension services, all domestic propagation, demonstrations, nursery activities, and distribution of plant material will comply with national plant health requirements. This includes **Law No. 26 of 2007 on Plant Quarantine** and **Executive Instructions** embedded in **Decision No. 23/T of 2008** to ensure that locally propagated seeds and plants meet quarantine and phytosanitary standards. The project will not involve import of seeds and plant parts to Syria.

All nursery-related activities will be implemented in line with the procedural and technical framework governing plant production and propagation established under **Ministerial Decisions No. 31/T of 2013**, and the relevant amendments updating the technical standards and quality control requirements applicable to public nurseries and seed multiplication activities, including **Decision No. 33/T of 2021, No. 42 of 2021, No. 43/T of 2021, and No. 65/T of 2021**.

In addition, through the direct involvement of the MoA in activity design, implementation, and technical backstopping, the project will operate in accordance with **Legislative Decree No. 11 of 2007** and **Decision No. 183/T of 2006**, which define MoA's mandate and institutional authority over public nursery operations and agricultural interventions. This approach ensures that all locally propagated plant material and demonstration plots are managed in accordance with Syrian law, preventing pest spread, maintaining seed quality, and supporting sustainable, climate-resilient agriculture.



By embedding these legal and regulatory requirements, the project strengthens institutional capacities, promotes climate-smart water infrastructure and agriculture, and contributes to sustainable, long-term water security and environmental protection. This supports long-term water security and environmental protection, directly contributing to GCF's paradigm-shifting climate adaptation objectives.

2.2 National social policy regulatory framework

Syria has also developed a body of texts regulating other areas of the social impacts of projects, including labour codes, and protection against the discrimination of women and children.

Table 1: Other national texts applicable to the project

Texts	Major provision related to the implementation of the project	Relevance to project activities
<p>Law No. 17 of 2010 - Labour law and implementing text of Legislative decree No. 28 relating to Occupational Safety and Health.</p> <p>As well as Law No. 92 of 1959 - Social Security and relevant amendments: Law No. 78 of 2001, law No. 28 of 2014, Presidential decree No. 103 of 2025.</p>	<p>The laws govern employment rights, working conditions, occupational health and safety, wages, and worker benefits.</p> <p>The labour law sets the minimum working age at 15 and allowing "light work" for ages 15–18 under certain conditions. It prohibits hazardous work for children under 18.</p> <p>Social security law and its amendments stipulate social security coverage for all workers, including health, pensions, work and injury benefits.</p> <p>Substantial changes to Law 17 and 92 are expected in the medium term with regards to modernizing coverage, benefits and financial sustainability.</p>	<p>The provisions of the Labour Law and the Social Security Law are relevant to the project as they guide the relationship between employers and workers during project implementation. Acted, as an organization already operating in Syria, ensures that all human-resources policies and procedures fully comply with national labour regulations, including requirements related to working conditions, occupational safety, and social insurance enrolment. In areas where national legislation provides general principles without detailed procedures, Acted complements national requirements with its internal policies, such as those promoting gender equality and non-discrimination, to strengthen good practice and ensure a safe and supportive working environment for all project staff and contractors.</p>
<p>Child Law No. 50 of 2003</p>	<p>The law prohibits child labour, regulates youth participation in economic activities, and guarantees children's rights to health, safety, and education.</p>	<p>Any activity involving youth, such as agricultural training or community-based water management, will be designed to ensure full compliance with child protection standards, with explicit prohibition of hazardous work and monitoring of safe participation. Where national child-protection legislation is limited, the project will operationalize international safeguarding measures to ensure full protection of children and youth.</p>

Texts	Major provision related to the implementation of the project	Relevance to project activities
Persons with Disabilities Law No. 29 of 2009	The law guarantees the rights of persons with disabilities to access services, infrastructure, and community participation. It remains the primary national framework governing accessibility, inclusion, and rights protections for people with disabilities. Although the law has not been updated since its enactment and does not fully reflect the standards of the Convention on the Rights of Persons with Disabilities, the project will apply inclusive design and participation practices aligned with both national law and international commitments.	The project will ensure that community water points, training venues, and project-supported infrastructure are accessible where feasible, and that people with disabilities are included in consultations, planning processes, and beneficiary selection.
Law No. 4 of 2019 which modifies certain articles of Legislative Decree No. 59 of 1953 – Personal Status law	The Syrian Personal Status Law (1953, amended 2019) regulates family, child, and inheritance matters, and highlights gender- and age-related protections. While the law includes minimum ages for marriage and custody rules, it maintains gender disparities	The project will ensure project interventions respect national legal thresholds while promoting gender equality, child protection, and inclusive participation in all activities, consistent with GCF safeguards and international best practice.
Antiquities Law No. 222 of 1963 and amendments	This law governs the protection of Syria's movable and immovable antiquities and relevant authorities the power to regulate, register, and safeguard heritage sites.	While the project will only operate on existing water infrastructure and agricultural lands, with no new construction, activities will remain aware of heritage protection obligations. There are no heritage sites identified in the project area, however compliance with the law will mitigate any potential risks and demonstrate due diligence regarding cultural heritage.
Law No. 10 of 2018 – Property law , and Law No. 26 of 2023 – Confiscated property law .	The laws govern property registration, management, and the use of land for redevelopment.	The project will undertake an initial assessment of land tenure and property use in the target areas to ensure that all activities are fully aligned with applicable laws and regulations. Project interventions will be designed to respect ownership rights, avoid any interference with legally recognized property, and support equitable access for all participants, including displaced or returning farmers.



It is important to note that while Syria has an established regulatory framework for both environmental and social impact management, many provisions are currently under revision in the context of the ongoing national transition. The project will ensure full alignment with existing and emerging laws by maintaining continuous monitoring of regulatory updates, coordinating closely with relevant government authorities, and incorporating any new requirements into project procedures and safeguards. This approach will enable the project to remain compliant with national legislation while proactively addressing evolving environmental and social standards.

The international policy framework, as well as governmental level policy documents are detailed in Annex 2, sections 3.6 and 9.1

3. Screening, methodology and categorization

3.1 Screening

An Environmental and Social Screening (ESS) was conducted for this project at the concept note and full proposal stages, aligned with both Acted and GCF policy requirements, including the Indigenous Peoples Policy.

As a result of the screening, some minimal environmental and social risks have been identified, and mitigation measures and monitoring requirements have been identified in the Environment and Social Action Plan (ESAP). The ESAP outlines the measures and commitments of the project to ensure that project activities are environmentally sustainable and socially inclusive and sets out how its environmental and social impacts will be managed while supporting climate resilience.

3.2 Methodology

The environmental and social screening was conducted in two parts. Firstly, Acted conducted an overarching ESS screening using the environmental and social safeguards (ESS) tool, which reflects Acted's Environmental and Social Protection Policy and the Green Climate Fund's eight performance standards (PS). Secondly, Acted conducted a focussed screening of Sexual Exploitation, Abuse and Harassment (SEAH) risks, using the GCF risk assessment toolkit. In addition to secondary data, both parts drew on Acted's stakeholder consultations (as outlined in detail in Annex 2).

1. ESS Screening

Acted's ESS screening tool is structured around the eight performance standards of GCF:

1. Assessment and management of environmental and social risks and impacts
2. Labor and working conditions
3. Resource Efficiency and Pollution Prevention
4. Community health, safety and security
5. Land acquisition and involuntary resettlement
6. Biodiversity conservation and sustainable management of living natural resources
7. Protection of Indigenous peoples
8. Protection of Cultural heritage

Each performance standard is divided into objectives, with sub-questions used to assess project activities. These are well aligned to the IP policy. For each activity, two aspects are evaluated:

- the **likelihood** that the activity causes the issue described in the sub-question; and
- the **impact** regardless of the likelihood.



Responses are scored as follows:

- Likelihood: *yes (score 1), unknown (score 0.5), no (score 0)*
- Impact: *high (score 1), medium (score 0.5), low (score 0)*

Each sub-question generates a combined score per activity for likelihood and impact. These scores are then used to determine:

- the overall likelihood of each activity triggering each PS;
- the overall impact on PS of each activity; and
- the significance rating for risk.

The significance rating signals how much attention a project activity will require during project development and implementation, and the level of control actions needed.

Figure 1 shows how likelihood and impact scores combine to determine risk levels.

		Likelihood of occurrence				
		Very unlikely to occur (1)	Low likelihood (2)	Moderately likely – could occur (3)	Known to occur – almost certain (4)	Common occurrence (5)
Impact	Severe (5)	Moderate	Substantial	High	High	High
	Major (4)	Low	Moderate	Substantial	Substantial	High
	Medium (3)	Low	Moderate	Moderate	Moderate	Substantial
	Minor (2)	Low	Low	Moderate	Moderate	Moderate
	Negligible (1)	Low	Low	Low	Low	Low

Figure 1: Risk level, based on likelihood and impact



3.3 Risk categorization

Acted's ESS tool was used to assess the overarching ESS risks associated with the project against the Green Climate Fund's eight performance standards (PS). Once all activities were screened for overarching ESS risks, using Acted's ESS tool, the results were summarised in a risk matrix. This matrix highlights the risks associated with each activity and the cumulative risks across all project activities under each performance standard.

Figure 2: Summary of findings from ESS tool

ACTIVITY	PS1: Assessment and management of environmental and social risks and	PS2: Labor and working conditions	PS3: Resource Efficiency and Pollution Prevention	PS4: Community health, safety and security	PS5: Land acquisition and involuntary	PS6: Biodiversity conservation and sustainable management	PS7: Indigenous peoples	PS8: Cultural heritage
Activity 1.1.1	Low	Low	Low	Low	Low	Low	Low	Low
Activity 1.1.2	Low	Low	Low	Low	Low	Low	Low	Low
Activity 1.2.1	Low	Low	Low	Low	Low	Low	Low	Low
Activity 1.2.2	Low	Low	Low	Low	Low	Low	Low	Low
Activity 1.3.1	Low	Low	Low	Low	Low	Low	Low	Low
Activity 1.3.2	Low	Low	Low	Low	Low	Low	Low	Low
Activity 1.3.3	Low	Low	Low	Low	Low	Low	Low	Low
Activity 2.1.1	Low	Low	Low	Low	Low	Low	Low	Low
Activity 2.1.2	Low	Low	Low	Low	Low	Low	Low	Low
Activity 2.1.3	Low	Low	Low	Low	Low	Low	Low	Low
Activity 2.2.1	Low	Low	Low	Low	Low	Low	Low	Low
Activity 2.2.2	Low	Low	Low	Low	Low	Low	Low	Low
Activity 3.1.1	Low	Low	Low	Low	Low	Low	Low	Low
Activity 3.1.2	Low	Low	Low	Low	Low	Low	Low	Low
Activity 3.1.3	Low	Low	Low	Low	Low	Low	Low	Low
Activity 3.1.4	Low	Low	Low	Low	Low	Low	Low	Low
Activity 3.2.1	Low	Low	Low	Low	Low	Low	Low	Low
Activity 3.2.2	Low	Low	Low	Low	Low	Low	Low	Low
PS	PS1: Assessment and management of environmental and social risks and	PS2: Labor and working conditions	PS3: Resource Efficiency and Pollution Prevention	PS4: Community health, safety and security	PS5: Land acquisition and involuntary	PS6: Biodiversity conservation and sustainable management	PS7: Indigenous peoples	PS8: Cultural heritage
	Low	Low	Low	Low	Low	Low	Low	Low



Acted's overarching ESS screening confirmed that the project is **categorized as C (low risk)**, despite identification of some contextual risks, as the activities themselves are not expected to generate significant adverse environmental or social impacts. While the project is implemented in a fragile and post-conflict context, contextual fragility does not automatically translate into higher environmental and social impact risks. Project activities are designed to avoid, minimise, and manage such risks through participatory approaches, institutional engagement, and operational safeguards. In particular, with respect to community health, safety, and security (PS4), the project does not involve activities that would increase exposure to conflict dynamics, population movements, land-related disputes, or security risks. The identified risks therefore inform the level of diligence, monitoring, and mitigation embedded in project design, rather than necessitating complex or intensive mitigation measures.

The ranking per activity and overall for each PS are summarised below.

3.4 Risk categorisation per performance standard

The ESS screening identified a limited number of contextual and activity-related risks, primarily associated with inclusion, resource efficiency, and implementation in a post-conflict setting. These risks are assessed as low due to the nature, scale, and design of the proposed activities, which focus on institutional strengthening, capacity building, small-scale rehabilitation, and nature-based solutions, and do not involve large-scale construction, land acquisition, population displacement, or environmentally disruptive works.

The main potential environmental and social risks identified through the screening are:

- Risks of prevailing gender norms limiting women and youth from equitably accessing project benefits and actively participating in water governance and climate adaptation activities (PS1)
- Risks related to resource efficiency and pollution prevention, including improper household-level greywater reuse and behavioural rebound effects following improved water supply infrastructure performance and support for farmers for climate adapted agriculture (PS3)
- Contextual risks related to community health, safety and security, given that the project is in a post conflict location (PS4)
- Potential risks of affecting in-tangible cultural resources of local communities such as values, norms, practices and traditional knowledge in a conservative social context (PS8)

The Environmental and Social Action Plan, elaborated in Section 4 below, details the mitigation measures to be taken per activity, structured across the eight PSs.

A summary of the relevance of each PS, an explanation of its risk rating, a summary of key impacts and mitigation measures is outlined below:

PS1: Assessment and management of environmental and social risks and impacts of Acted's ESS tool assesses PS1 (Assessment and management of environmental and social risks and impacts) against GCF's four objectives:

1. Identify funding proposal's environmental and social risks and impacts
2. Adopt mitigation hierarchy: anticipate, avoid; minimise; compensate or offset
3. Improve performance through an environmental and social management system
4. Engagement with affected communities or other stakeholders

Acted used 13 sub-questions to assess these four objectives, focusing notably on exploring potential risks related to exacerbating existing gender inequalities; gender-based discrimination



around the use and management of natural resources; impact on vulnerable groups; transboundary impacts on air, water or other natural resources; impact on human rights including through affecting traditional community or government systems that protect these rights; stakeholder engagement; and culturally-appropriate Grievance Redress Mechanisms.

PS1 is relevant to the project, notably linked to risks around exacerbating gender inequalities and gender discrimination, given the prevailing gender norms in Syria. This is reflected in ESAP's focus on gender-related risks and mitigation measures linked to PS1. The overall risk rating for PS1 is, however, low, because potential impacts have been mitigated through project design.

To address the potential risk of reinforcing gender inequalities (**PS 1**), the project will promote inclusive and participatory decision-making process across all activities, including water governance structures, farmer associations and community accountability mechanisms (**Activities 1.2.2, 3.1.1**). To promote effective participation and make governance meetings and capacity building activities more accessible to women, venues with safe access will be ensured and meetings will be scheduled during daytime to allow safe movement to and from meeting venues. Where possible, women-only trainings and consultations will be done. To mitigate illiteracy challenges, Acted will adapt training curricula with literacy support where needed and localize activities to reduce travel time.

Acted will advocate for minimum participation targets in Water User Associations, and other grassroots water governance structures. Where feasible, these targets will be embedded in local regulations to ensure targeted participation and leadership (**Activity 1.2.2**). To ensure that women access the project resources, the beneficiary selection criteria will include women headed households and households with disabled members (**Activities 2.2.1, 2.2.2, 3.1.2**). To support women's access to financial resources to enhance livelihoods, women headed households will be targeted for financial grants (**Activity 3.1.4**) to support water efficient techniques and climate-smarts inputs for agriculture. Parallel to this, the project will roll out gender and inclusion workshops and conflict resolution training (**Activity 1.2.2**) to increase buy in of the community.

To enhance women's participation in providing project feedback, Activity **1.2.2** will support the building of local water management accountability systems. Sub-grants will be provided to local community structures who will conduct consultations and awareness for women and other vulnerable groups to communicate their priorities and needs and provide feedback to the project coordination bodies. Finally, Acted's Accountability and Feedback Mechanism (AFM) will provide a formal safe channel for women and youth to raise concerns. Through this package of measures, the project not only mitigates gender-related risks but also strengthens women's leadership, economic empowerment, and equitable access to resources. A Gender Assessment and Action Plan detailing management of potential gender-related risks is under Annex 4.

PS2: Labour and working conditions

Acted's ESS tool assesses PS2 (Labour and working conditions) against GCF's six objectives:

- i. Fair treatment, non-discrimination, equal opportunity
- ii. Good worker–management relationship
- iii. Comply with national employment and labour laws
- iv. Protect workers, in particular those in vulnerable categories
- v. Promote safety and health
- vi. Avoid use of forced labour or child labour

Acted used 19 sub-questions to assess these six objectives. These questions focused on risks such as unfair discrimination in hiring; workplace discrimination, harassment or abuse; performance management systems; transparent information on rights and benefits; labour law



compliance; Grievance Redress Mechanisms accessible and safe for staff; workplace exposure to violence or threats; hazardous working conditions; child labour and forced labour, including through the supply chain.

PS2 is relevant to the project notably in terms of health risks from potential biological hazards from grey water reuse, and labour risks associated with use of child labour in supply chains. These priorities are reflected in the ESAP in Section 4 below. The overall risk rating for PS2 is low, seeing as potential impact has been mitigated through project design.

PS3: Resource Efficiency and Pollution Prevention

Acted's ESS tool assesses PS3 (Resource Efficiency and Pollution Prevention) against GCF's three objectives:

- i. To avoid or minimise adverse impacts on human health and the environment by avoiding or minimising pollution from project activities
- ii. To promote more sustainable use of resources, including energy and water
- iii. To reduce project-related greenhouse gas emissions

Acted used seven sub-questions to assess these three objectives. The screening focussed on assessing risks such as the release of pollutants and chemicals that are toxic to the environment and/or with high toxicity to living organisms; generation and/or disposal of hazard waste; greenhouse gas emissions; and the reduction of carbon pools.

The project activities have low risks related to leakage of greywater and potential increases in water consumption following improved infrastructure performance.

To manage the risks associated with resource efficiency and pollution prevention (**PS3**), the project will conduct capacity building on proper handling, treatment and reuse of greywater through kitchen gardens support to avoid stagnation of effluent. Beneficiaries of the household level greywater systems will also receive training on operations and maintenance of the systems to avoid leaking of greywater into the environment (**Activity 2.2.2**). Water quality surveillance of greywater effluent will be conducted to ensure that the treated effluent is within the national reuse permissible standards. Greywater treatment will occur at household and institutional levels, with the network separated from blackwater to prevent contamination. Treatment will use simple, low-cost technologies across four steps: Screening: First, a 3–5 mm metal mesh screen removes large solids such as hair and soap residue, cleaned every 2–3 days to prevent clogging. The water then passes through grease traps to remove kitchen scum before entering a sedimentation chamber, where sand and grit settle by gravity; the chamber's inlet/outlet positioning and low flow velocity ensure adequate retention time and prevent sludge resuspension. From there, the water flows through a three-layer sand and gravel filter (coarse, medium, and fine) to remove any remaining suspended solids. Finally, the treated water is collected in a covered, lined storage pit, used within 24 hours to prevent bacterial growth, and regularly maintained. Capacity building on O&M will be provided to ensure efficient long-term operation. Outreach with the wider community will be conducted to inform communities on the appropriate greywater management activities.

To address the risks of potential high-water consumption, Acted will equip all maintained drinking water infrastructure (**Activity 2.1.1**) and communal boreholes used for agriculture (**Activity 3.1.1**) with water flow meters to monitor the amount of abstracted water. To ensure that farmers comply with groundwater-use allocations, the project will integrate metered groundwater abstraction monitoring with aquifer-level tracking, community water governance and climate-smart water management. Farmers will be reporting the water abstractions from their boreholes and periodic audits will be conducted to verify compliance. Local governance structures, particularly Water User Committees, will ensure community enforcement through locally agreed bylaws, rules,

Commented [MR1]: GCF: How do you manage the end of life or damaged solar panels? Please discuss.

Response: The proposed measures have been added in track changes under PS3 here, and included in the ESAP table below (**Activity 2.2.1**)

Commented [GCF-ESS2R1]: GCF: Noted. Thank you.

Commented [MR3]: GCF: Please describe how the grey water effluent will be treated

Response: Grey water treatment approach is detailed below, and summarized in the document in track changes.

Under Sub-Activity 2.2.2.1 greywater treatment and reuse will be at household and institutional. The greywater network will be separated from black water to avoid contamination risks. The treatment will employ simple low-cost technologies with the following treatment steps:

Screening: This process will be done to remove large solids such as hair, soap residues and other large substances. A metal mesh screen opening size 3–5 mm will be installed before the water enters the treatment system. The screen will be cleaned regularly every 2–3 days to prevent clogging.

Grease removal and Sedimentation: After screening, the system will have grease traps to remove scum that is usually found in influent from kitchens. After grease removal the greywater goes through a sedimentation chamber. The purpose of this process is to allow heavier materials to settle by gravity. The target pollutants are sand and grit. In the sedimentation chamber the inlet and the outlet will be positioned in a way that avoids short circuiting to allow the design retention time to be achieved. The design velocity of the water in the chamber will be low to avoid resuspension of the sludge

Sand and Gravel Filtration: From the sedimentation chamber the water will go into sand and gravel filters that will consist of three layers of coarse gravel, medium gravel and fine gravel. These filters will allow physical filtration of suspended solids that would have escaped the sedimentation process.

Storage: After passing through the sand and gravel filter, the treated water is collected in a covered, lined storage pit. The pits will be regularly maintained and cleaned, and the treated water will be used within 24 hours to avoid bacterial growth.

The project will ensure capacity building on O&M of the treatment system for efficient treatment to be achieved.

Commented [GCF-ESS4R3]: GCF: Noted. Thank you.



transparent keeping, and dispute resolution mechanisms (**Activity 3.1.1**). Specific operational and water management plans will be developed with local water departments and farmer associations to ensure sustainable water use (**Activity 2.1.3, 3.1.1**), combined with the above-mentioned reporting and periodic audits, to enable sustainable oversight.

To address the potential risks caused by solar panels at their end of life or when they are broken, (**Activity 2.1.1**), Acted will train water station operators on safe disposal of system components such as panels. Operation and maintenance manuals will be provided to ensure that panels remain functional as per the design lifespan. Acted will also formalise agreements with certified recycling facilities to promote recycling of the solar panels. During procurement, Acted will consider longer-life panels and include clauses in the procurement contracts that require supplier take-back and or extended producer responsibility where possible.

Overall, the PS3 risk for the project is assessed as low due to mitigation through project design.

PS4: Community health, safety and security

Acted's ESS tool assesses PS4 (Community health, safety and security) against GCF's two objectives:

- i. To safeguard personnel and property in accordance with relevant human rights principles
- ii. To anticipate and avoid adverse impacts on the health and safety of the affected community

Acted used 14 sub-questions to assess these two objectives. The screening focusses heavily on risks related to actions in a conflict-affected or post-conflict affected area, given the geographic targeting of the project. This included questions around exposing communities to security risks; exacerbating existing conflicts or generating new tensions within or between communities; increasing tensions by placing additional pressure on scarce local resources; and risks related to human-wildlife conflict. The tool also probed risks related to public health including health risks from waterborne or vector-borne diseases, communicable infections, or poor sanitation; exposure to air pollution or traffic; exposure to accidents and/or natural hazards; and health and safety risks linked to construction or infrastructure development.

The project will be implemented in a **post conflict area** with weakened capacities of the local institutions, damaged infrastructure and vulnerable populations (women, youth, elderly, IDPs, returnees) (**PS4**). While Syria continues to experience national-level conflict dynamics, the selection of Eastern Ghouta as the project area was informed in part by its stability compared to other parts of the country. The area's demographic profile is ethnolinguistically homogeneous and no significant ethnic or linguistic minority groups. No evidence was identified indicating the presence of existing community-level conflicts or tensions. Furthermore, the project does not involve activities that would increase exposure to security risks, such as large-scale construction, deployment of security personnel, land acquisition, or activities that could trigger population movements or land disputes.

The project is nonetheless aware of the risk of conflict spillover from the national context, and the need to remain sensitive to potential issues related to water access between agricultural and domestic users, particularly during peak irrigation season; inequitable access to groundwater driven by unregulated and individually managed abstraction; and pressure on shared resources arising from the significant return of IDPs to the governorate since December 2024.

The project incorporates adaptive program design to respond to such low-level risks, including participatory and locally led implementation approaches, gender-sensitive engagement



mechanisms, and ongoing stakeholder consultation throughout the project, as detailed further below. Should national-level conflict dynamics affect the project area during implementation, the project design will enable timely identification and response.

To mitigate the potential risks, from the outset, Acted will conduct inclusive and transparent community consultations to ensure that all relevant groups are informed of, and have the opportunity to contribute to, decisions regarding project activities, locations, and modalities. These consultations will seek to identify potential sensitivities, perceptions of exclusion, or sources of tension prior to implementation. To address post-conflict risks and uphold the Do No Harm principle, the project will integrate social cohesion considerations across activities while strengthening climate adaptation outcomes. Acted will support regular community meetings (**Activity 1.2.2**) and promote joint communal activities (**Output 3.2**) that generate shared benefits, encourage collaboration across groups, and reduce the risk of competition or exclusion. Potential tensions or social dynamics will be continuously monitored through Acted's regular field presence, community engagement activities, and feedback mechanisms. Field teams will report emerging issues through established internal communication channels, with concerns escalated to Area Coordinators and senior management as needed to enable timely response and adjustment of activities. Where relevant, Acted will also coordinate with local authorities, community leaders, and existing local conflict-mediation or civil society actors to support dialogue, resolve disputes, and reinforce peaceful community interactions. These measures will ensure that project implementation remains conflict-sensitive, adaptive to changing social dynamics, and supportive of social cohesion and community recovery, while avoiding contributing to any tensions.

To strengthen support for improved service delivery, the project will provide targeted capacity strengthening to local authorities on inclusive planning, conflict sensitivity, and the implementation of environmental and social safeguards. Water departments will be supported in strengthening cost recovery systems and O&M (**Activity 2.1.3**), community reporting mechanisms to prevent water loss (**Activity 2.1.2**). **Activity 1.2.1** will support development of local Integrated Water Management Plans and response scenarios to water scarcity where communities will be consulted. In addition, Acted's grievance redress mechanism, the Acted Feedback Mechanism (AFM), will provide safe channels for residents to report or give feedback on quality-of-service delivery, governance and accountability issues to mitigate further risks associated with post conflict areas.

Overall, the risk for PS4 is low, as potential impact has been mitigated through project design.

PS5: Land acquisition and involuntary resettlement

Acted's ESS tool assesses PS5 (Land acquisition and involuntary resettlement) against GCF's three objectives:

- i. Avoid/minimise adverse social and economic impacts from land acquisition or restrictions on land use
- ii. Improve or restore livelihoods and standards of living
- iii. Improve living conditions among displaced persons by providing adequate housing and security of tenure

Acted used five sub-questions to assess these three objectives, focussing on risks related to involuntary resettling of people; forced eviction; economic displacement linked to restricting access to land or livelihoods; and expropriating or acquisition of land rights.

PS5 is relevant only to a limited extent due to activities involving revegetation of degraded public land, due to temporary or perceived restrictions on land access during revegetation activities (Output 3.2). These activities will not involve land acquisition, involuntary resettlement, economic

Commented [MR5]: GCF: Are there existing conflict-sensitive tensions or potential issues during project implementation in the target areas at the moment? If so, these need to be identified at this point.

For instance, tension as regards unequal access to the water supply may occur during implementation. Other specific existing and future tensions may be identified and mitigated.

Response: While Syria continues to experience national-level conflict dynamics, the selection of Eastern Ghouta as the project area was informed in part by its stability compared to other parts of the country. The area's demographic profile is ethnolinguistically homogeneous and no significant ethnic or linguistic minority groups. No evidence was identified indicating the presence of existing community-level conflicts or tensions.

The project team is nonetheless aware of the risk of conflict spillover from the national context, and the need to remain sensitive to potential issues related to water access between agricultural and domestic users, particularly during peak irrigation season; inequitable access to groundwater driven by unregulated and

Commented [GCF-ESS6R5]: GCF: Thank you for the clarification. We recommend that the response be integrated in the discussion in the relevant section.

Commented [MR7R5]: Acted: Thank you. The above response has now been integrated under PS4 narrative.

Commented [MR8]: GCF: please complete the sentence

Response: Sentence completed in track changes.

Commented [GCF-ESS9R8]: GCF: Thank you.

Commented [MR10]: GCF Q: please describe what is "limited extent" meant here. what exactly is expected to happen when you revegetate public lands that is relevant to PS5 and how does the project address that?

Commented [GCF-ESS11R10]: GCF: Thank you for the clarification. We would recommend that the explanation on "limited extent" be included in the narrative. That for instance, the "limited extent" pertains to the

Commented [MR12R10]: Acted: This paragraph has now been updated to clarify the limited extent pertains to the temporary or perceived restrictions on land access during revegetation activities and further details from the above answer have been integrated into the narrative.

Commented [GCF-ESS13]: This sentence seems hanging. Please revisit and complete, if needed.

Commented [MR14R13]: Acted: this sentence has been completed, in line with the above comment.



displacement, or restriction of access to livelihoods. Participatory mapping and consultation with local authorities and communities will be conducted to avoid conflict over land use. No revegetation will proceed in areas where it would restrict community access to livelihoods. Additionally, the revegetation approach will prioritise species and designs that enhance rather than restrict livelihood opportunities. Restored vegetation cover is expected to expand grazing availability and reduce pressure on degraded rangelands, making revegetation a net resource gain for local communities. PS5 risks are therefore assessed as low.

PS6: Biodiversity conservation and sustainable management of living natural resources

Acted's ESS tool assesses PS6 (Biodiversity conservation and sustainable management of living natural resources) against GCF's four objectives:

- i. Protection and conservation of biodiversity
- ii. Maintenance of benefits from ecosystem services
- iii. Promotion of sustainable management of living natural resources
- iv. Integration of conservation needs and development priorities

Acted's ESS tool used 13 sub-questions to assess these four objectives, focussing on legally-protected areas and reserves; activities in areas recognised for high biodiversity value; introduction of invasive species; disturbance to wildlife related to construction noise; extraction of groundwater; negative impact on ground or surface water; utilisation of genetically modified organisms; and alignment of conservation goals with communities' development priorities.

PS6 is relevant in relation to groundwater sustainability and ecosystem-based adaptation measures. Potential risks include saline intrusion or ecological stress associated with unsustainable abstraction. These risks are mitigated through groundwater monitoring, abstraction control via flow meters, and ecosystem-based recharge measures such as infiltration trenches and revegetation (Output 3.2). Flow meters will enable real-time monitoring of extraction volumes, integrated within a broader system of controls to prevent over-abstraction. Pumping thresholds established under local water management plans will trigger restrictions when needed (Sub-Activity 1.2.1.2), while seasonal and daily extraction will be aligned with aquifer safe-yield estimates from hydrogeological assessments and pumping tests (Activity 1.1.1). Local rules and regulations will reinforce compliance and community accountability (Activity 1.2.2), ensuring that monitoring data, technical controls, and community oversight work together to sustain groundwater abstraction. Activities are small-scale and designed to enhance, rather than degrade, ecosystem services. PS6 risks are assessed as low.

Additionally, there is no project risk of invasive species introduction or use of GMOs. All nurseries involved are public institutions operating under the Ministry of Agriculture and are guided by Syria's national regulatory framework and applicable laws. For example, the MoA has clear guidance (including a Guide for Handling Plants and their Parts), and a Plant Quarantine Law governing the multiplication, importation and exportation of plants and plant materials. These institutions have established protocols for species screening and seed certification that are applied as standard practice. The project does not introduce new species or seed varieties outside of this framework.

Project support - including equipment provision and Training of Trainers for extension staff - is designed to strengthen the capacity of these institutions to deliver their existing mandate more effectively, not to alter their operating standards. Training content will reinforce compliance with national environmental and biosafety standards, ensuring that staff are equipped to apply established protocols consistently and in line with climate adaptation objectives.

Regarding the risk of maladaptation (Output 3.2), there is also no identified risk. MoA nurseries in Eastern Ghouta will be supported to produce pasture and forest seedlings using locally

Commented [MR15]: GCF Q: Again, please describe how do you exactly control over extraction. Even if there will be flow meters, people can overextract. What mechanisms will be put in place to avoid this.

Response: The flow meters will enable continuous flow monitoring ensuring real-time tracking of extraction volumes. To control over abstraction local water management plans, pumping thresholds established under the pumping schedules will be used to trigger pumping restrictions Sub-Activity 1.2.1.2. Seasonal and daily extraction will be aligned with aquifer safe-yield estimates derived from hydrogeological assessments that include capacity pumping test (Activity 1.1.1). Local level rules and regulations will regulate usage and maintain compliance and local management accountability (Activity 1.2.2). Therefore, water flow meters are part of a system that integrates monitoring data, community oversight, and technical controls to mitigate over abstraction risks and ensure sustainable groundwater abstraction.

This has been summarized and reflected in the text.

Commented [GCF-ESS16R15]: GCF: Thank you for the clarification.



appropriate and climate-adapted species selected in accordance with national guidelines. The MoA - together with its affiliated nurseries and the Agricultural Research Institute - has extensive experience with species well-suited to the Syrian environment, and this expertise directly guides both propagation and afforestation efforts. Within the project, afforestation will prioritize native and well-adapted species capable of helping restore the area to its historical ecological state. Multi-purpose species that have demonstrated strong adaptation to Syrian conditions and offer tangible benefits to local communities may also be incorporated.

PS7: Indigenous peoples

Acted's ESS tool assesses PS7 (indigenous peoples) against GCF's four objectives:

- i. Ensure full respect for indigenous people
- ii. Avoid/minimize adverse impacts
- iii. Sustainable and Culturally Appropriate Development Benefits and Opportunities
- iv. Free, prior and informed consent in certain circumstances

Acted's ESS tool used 10 sub-questions aligned to the IP policy to assess these four objectives, focussing on impact of land and territory ownership and claimed by indigenous peoples; the impact of partnerships with public and private entities, use and commercialisation of natural resources for indigenous peoples; the right and safety of indigenous peoples in voluntary isolation and/or displacement; impact on cultural heritage of indigenous peoples by using or contributing to the commercialisation of indigenous peoples' traditional knowledge or practices; impact on indigenous peoples' livelihoods through physical or economic displacement; the impact of the use of natural resources for indigenous peoples and community acceptance and informed consent of indigenous peoples.

An assessment was done in accordance with the GCF IP policy and ESS7 environmental and social due diligence, including demographic profiling, stakeholder consultations¹, and a review of secondary literature and international databases. To this end, Acted considered a broad definition of Indigenous Peoples, including Assyrians/Syriac, Kurds, and Armenians as potentially qualifying in the Syrian context. In line with information available from the International Work Group for Indigenous Affairs (IWGIA) and based on secondary sources, and stakeholder consultations considering this wider definition, no evidence was identified indicating the presence of Indigenous Peoples in Eastern Ghouta:

- The population of Eastern Ghouta is overwhelmingly composed of Arabic-speaking Levantine Syrians, predominantly Sunni Muslims. These communities do not constitute an Indigenous Population Group.
- Kurds, Assyrians/Syriacs, and Armenians are not historically concentrated in Eastern Ghouta. While small numbers of some of these communities may reside in the broader Damascus Governorate, no evidence was identified of presence of these groups within the project area.

¹ Acted's broad and inclusive stakeholder consultation for the project involved national, sub-national, and community-level engagement. This included government, UN, NGO, and community representatives - including farmers, youth, women, and other vulnerable groups (returnees, elderly, and former detainees) - as well as CSO representatives from Douma and Harran Alwameed. In total, Acted consulted nearly 100 individuals, with approximately 30% female representation at national and sub-national levels and 56% at community level. These consultations directly informed the project's Gender Analysis, ESAP, and overall project design. These consultations are further detailed in Annex 2.



- There is also a small presence of religious minorities – critically not considered indigenous ethnic groups – including Christian and Shia communities, although this is very limited in the project area.

While no evidence was identified indicating the presence of Indigenous Peoples, as defined under international standards, and this wider IP definition applied by Acted within the project area, Acted will actively monitor changes in community composition throughout project implementation under ESAP obligations.

PS8: Cultural Heritage

Acted's ESS tool assesses PS8 (Cultural Heritage) against GCF's two objectives:

- i. Protection and preservation of cultural heritage
- ii. Promotion of equitable sharing of cultural heritage benefits

Acted's ESS tool uses eight sub-questions to assess these two objectives, focussing on activities close to cultural heritage sites or of cultural, spiritual, or symbolic significance; construction that may impact cultural sites; activities that may affect intangible cultural resources of local communities such as values, norms, practices, traditional knowledge, language, literary or artistic creation; and equal access to or benefit from cultural resources.

This PS is relevant to the project as the project seeks to shift existing traditional practices in water resources governance and climate adapted agriculture in a society characterised by deep cultural norms, values and beliefs. To address the risks on intangible cultural resources of local communities such as values, norms, practices, traditional knowledge, language, literacy or artistic creation, the ESAP incorporates necessary mitigation measures.

To address risks of affecting intangible cultural resources of local communities such as values, norms, practices and traditional knowledge due to the country's conservative nature (**PS8**), Acted will conduct several community engagements. Mitigation will be through ensuring culturally appropriate and inclusive consultations, integrating traditional knowledge into technical design and translating all capacity building materials into Arabic (**Activities 1.2.1, 1.2.2, 1.3.2, 2.2.2; 3.1.1, 3.1.2**). Sensitive cultural arrangements will also be considered during capacity building trainings (women-only trainings when needed). Acted will ensure that all project activities will avoid disruption of cultural practices, protect community intellectual property rights, and use culturally sensitive practices according to local norms for staff and contractors. Continuous monitoring on the project's impact on cultural values will be done and Acted's feedback mechanism which is culturally sensitive will be used to allow beneficiaries to provide feedback and all grievances throughout the project lifecycle. Under **Activity 1.2.2**, the project's accountability system will enhance through provision of feedback on project activities.

Overall, the mitigation measures incorporated into the project design result in low risk for PS8.

The detailed Environmental and Social Action Plan for the project, structured by the eight Performance Standards, is elaborated in section 4 below.

4. Environmental and social action plan

Table 2: Environmental and social action plan

Activities	Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
PS1: Assessment and management of environmental and social risks and impacts							
Create, exacerbate or perpetuate gender-related inequalities or have adverse impacts on the situation of women and girls							
Activity 1.2.2 Build local water management accountability systems	The strengthened/ created structures and mechanisms may reflect existing social norms and informal power structures, limiting women's effective participation and influence or potentially constraining women's and other vulnerable groups' access to information, participation and reporting.	Local governance structures will include minimum participation targets for women representation. Acted will conduct technical capacity building to empower women on water governance under the supervision of the Gender and Safeguarding Specialist Acted will ensure that all capacity building training on water governance are gender sensitive and conducted in accessible locations and time. Consultations ensure equitable participation of women and other vulnerable groups to allow for them to voice their reflections on the project and local water management	Low	Acted/MoLAE Gender and Safeguarding Specialist	Y1-Y5	20 percent of the members in the water governance structures are women enabling women's meaningful participation in local water-management decisions. 100 percent of female members are trained on climate resilient water management and planning tools 100 percent of capacity building workshops on water governance are gender sensitive 30 percent of women participate in community consultations (e.g. focus group reflections)	Costing for mitigation measures are included within overall activity budgets

Commented [MR17]: GCF Q: How do you ensure that "Sub-grant recipients" and third-party implementers (e.g. government partners, community structure, local financial institution) also comply with E&S requirements including that of the ESAP? Please describe.

Response: This will be ensured through a combination of formal agreements, upfront screening and ongoing oversight:

At the institutional level and governance level, E&S compliance obligations are formalised through the arrangements between Acted Syria and MoLAE as the two Executing Entities of the project outlined in the Term Sheet (Annex 6). The operational manual will further define roles, responsibilities and E&S compliance requirements. Grant agreements with sub-grantees will embed ESAP obligations. Additionally, Acted Syria's PMU will maintain ongoing oversight of E&S commitments and performance. Where issues are identified, these can be escalated through the PMU to the Technical Working Group for recommendations, and, where necessary, to the PSC chaired by MoLAE for strategic guidance and

Commented [GCF-ESS18R17]: GCF: Thank you for the clarification. We would recommend that this discussion is included in the relevant section - perhaps on ESAP implementation arrangements (Section 5)?.

Commented [MR19R17]: Acted: This clarification has been further reflected in Section 5 - ESAP Implementation Arrangements (and Acted has responded directly to the comment on this topic in that Section as well)

Commented [MR20]: GCF: Please note that GCF assess the risk significance for the purpose of risk categorization "before mitigation measures are applied".

Para 31 of GCF RESP states that "The risks and impacts will be assessed at the pre-mitigation stage..."

Commented [GCF-ESS21R20]: GCF: Noted.



Activity 1.3.3 Strengthening of the NDAs capacity to catalyse climate financing	Strengthening climate planning and service delivery systems may not fully reflect the distinct needs and roles of women if gender considerations are not systematically integrated, including within the development of climate adaptation and mitigation Concept Notes and investment pipelines.	Climate adaptation frameworks and tools are reviewed to support the development of gender-inclusive Concept Notes within the project pipeline Recruitment of a Gender and Safeguarding specialist will be responsible for oversight of the implementation of the GAP (Annex 4) and monitoring of any potential risks.	Low	Gender & Safeguarding Specialist, Consultant	Y1-Y5	Indicator 1: 100 percent of Concept Notes developed are gender inclusive	Cost for mitigation measures are included within overall activity budgets
Activity 2.1.2 Establish a robust leak detection and response system	The created response system may reflect existing social norms and informal power structures, limiting women's effective participation.	Inclusion of women and other vulnerable groups in reporting mechanisms to identify needs and preferences across community members	Low	Gender & Safeguarding Specialist, Acted/MoLAE Rural Damascus and Countryside Water Resource Directorate	Y2-Y5	Indicator 1: # of consultation processes conducted with women to inform development of the community reporting system	Cost for mitigation measures are included within overall activity budgets
Activity 3.1.1 Capacity building for farmers' associations	The strengthened/ created structures may reflect existing social norms and informal power structures, limiting women's effective participation and influence.	Farmer associations include women representatives (where relevant) to secure female participation and decision-making power in community agriculture and water governance bodies Acted will ensure that all capacity building training on water governance are gender sensitive and	Low	Acted/MoLAE Gender and Safeguarding Specialist	Y1-Y5	At least 20 percent of farmers association members are women (where relevant) All female members of farmer associations participate in the development of O&M plans for equipment	Costing for mitigation measures are included within overall activity budgets

		<p>conducted in accessible locations and time.</p> <p>Female farmers participate and engagement in plan developments to ensure women's ability to share climate resilient planning and resource allocation outcomes</p> <p>Dedicated oversight by the Gender and Safeguarding Specialist to ensure design commitments are upheld in practice</p>					
Activity 3.1.2 Training on climate adapted agricultural practices	Strengthening agricultural, extension, and climate-resilience systems may inadvertently limit women's access to project benefits, particularly for female-headed households, if participation modalities are not designed with inclusivity in mind. Training schedules and technical services that are not adapted to women's mobility, time constraints, or caregiving responsibilities could reduce their opportunities to access technical knowledge, and capacity-building	<p>Women inclusion in climate smart techniques trainings ensuring trainings are adapted to women's mobility, schedules or caregiving responsibilities</p> <p>Gender specific sessions are systematically integrated within the training sessions.</p> <p>Acted will prioritize women participants/ employees during the ToT climate smart agriculture training(where feasible)</p>	Low	Gender & Safeguarding Specialist, Acted/MoLAE Acted MEAL team Ministry of Agriculture	Y1-Y5	<p>At least 30 percent of selected beneficiaries are women</p> <p>At least 5 percent of selected beneficiaries are elderly</p> <p>At least 5 percent of selected beneficiaries have a disability</p> <p>100 percent of trainings conducted include gender sensitive session to address women and men's differentiated needs</p> <p>75 percent of targeted women who report that attending the training/sessions did</p>	Costing for mitigation measures are included within overall activity budgets



	support. This may affect women's ability to adopt water-efficient, climate-resilient practices and to effectively respond to water scarcity and climate-related challenges.					not add to their workload 30 percent of the existing female staff of extension services and environmental department are provided with the ToT training	
Discriminate based on gender when giving access to resources, services, or benefits							
Activity 2.2.1 Installation of water-efficient fixtures	Gender norms, informal power dynamics, and affordability constraints may result in unequal access to project-supported water-efficient fixtures. Without deliberate gender-responsive targeting and design, women, particularly female-headed households and other vulnerable groups, may be excluded from beneficiary selection, decision-making, or effective use of fixtures. Poorly designed fixtures may also increase women's unpaid labour (e.g. repeated filling, flushing, or cleaning), or negatively affect privacy and dignity, thereby undermining equitable access and	Prioritization of female-headed households and other vulnerable households in the allocation of water-efficient fixtures, using clear and transparent eligibility criteria aligned with the project's beneficiary selection framework Consult women and girls during the selection of water-efficient fixtures to ensure that chosen technologies reduce water consumption without increasing domestic labour, such as repeated flushing, frequent refilling of containers, or additional cleaning requirements Ensure fixtures are compatible with existing household water use practices and do not compromise privacy or	Low	Gender & Safeguarding Specialist, Acted/MoLAE Acted MEAL team,	Y2-Y5	30 percent of households targeted with water efficient fixtures are female headed households.	Costing for mitigation measures are included within overall activity budgets

	sustainability of water security outcomes.	<p>dignity, particularly for sanitation and hygiene related uses</p> <p>Provide user guidance tailored to women and caregivers on the correct use and maintenance of fixtures to maximise water savings while preserving functionality and comfort.</p> <p>All fixtures and installation practices will align with Sphere standards on minimum water quantity, accessibility, safety, and usability for domestic use</p>					
Activity 2.2.2 Installation of small scale greywater recycling systems for household reuse	Gender norms, informal household decision-making dynamics, and unequal division of unpaid care and domestic labour may result in women, particularly female-headed households and vulnerable households, being excluded from beneficiary selection, training, or decision-making related to greywater systems. In addition, inappropriate system design or inadequate training may increase women's workload for operation and maintenance (O&M) and expose	<p>Prioritization of female-headed and vulnerable households in the selection of beneficiaries for greywater recycling systems, using transparent eligibility and vulnerability criteria</p> <p>Install low-maintenance, passive or semi-passive greywater systems wherever feasible, to avoid increasing women's unpaid labour for routine O&M. Design choices will prioritise simplicity, safety, and compatibility with existing household practices</p>	Low	Gender & Safeguarding Specialist, Acted/MoLAE Acted MEAL team	Y2-Y5	<p>30 percent of households targeted with installed small greywater recycling systems are female headed households.</p> <p>25 percent of targeted FHHs with greywater recycling systems are supporting with establishment of home gardens or hydroponic systems.</p>	Costing for mitigation measures are included within overall activity budgets

Commented [MR22]: GCF: See relevant comment on revisiting the significance.

Response: The original risk designation as medium was a misrepresentation. The risk is assessed as low because equitable access, safety, and gender-responsive design are built into the core architecture the project (**Activity 2.2.2**), rather than addressed after implementation begins. Beneficiary selection explicitly prioritises female-headed and vulnerable households using transparent vulnerability criteria, ensuring that those most at risk of exclusion are given precedence. System design requirements mandate low-maintenance technologies, directly addressing the risk of increasing women's unpaid labour burden through design choice rather than post-installation adjustment. Pre-installation consultations with both women and men in beneficiary households are embedded as a prerequisite to installation, ensuring shared understanding on system operation and maintenance. Targeted training for women on safe handling and reuse restrictions, alongside visual, low-literacy-friendly O&M materials, ensures that women are equipped to engage safely and confidently with the systems from the outset. Together, these design features address the structural and household-level conditions that may cause this risk, making gender-responsive implementation an inherent characteristic of the activity rather than a subsequent corrective measure.

Commented [GCF-ESS23R22]: GCF: Noted.

	<p>them to higher health risks due to greater contact with greywater, thereby undermining equitable access, safety, and sustainability of project benefits.</p>	<p>Conduct pre-installation consultations with both women and men in beneficiary households to ensure shared understanding, acceptance, and agreement on system use, responsibilities, and limitations, thereby reducing intra-household conflict and misuse</p> <p>Provide targeted training to women and caregivers on safe handling, operation, and reuse restrictions of greywater systems, including clear guidance that reuse is limited to non-food crops or approved uses only, in line with national standards and WHO guidance</p> <p>Develop visual, low-literacy-friendly O&M materials (e.g. pictorial guides) to ensure correct use and maintenance by all household members, including women with limited literacy</p> <p>Dedicated oversight by the Gender and Safeguarding Specialist</p>					
Activity 3.1.4 Establish	Risk that social norm, informal power	Women's participation in cost-sharing grants and	Low	Acted/MoLAE	Y2-Y4	30 percent of selected beneficiaries for cost	Costing for mitigation



locally driven financing models	dynamics and formal land ownership documentation may lead to unequal access to project supported financing mechanisms. Without deliberate gender responsive targeting and delivery mechanisms, women, particularly female headed households (FHHs) and vulnerable households may be excluded from beneficiary selection and training,	revolving funds enables access to financial tools that support adaptation to climate shocks and climate-resilient livelihoods		Ministry of Agriculture Irrigation Directorate		sharing grants are women 10 percent of women participating and managing a revolving fund All female beneficiaries will receive business management training and mentoring	measures are included within overall activity budgets
Limit access to resources, services, or benefits for vulnerable groups							
Activity 2.1.3 Strengthen water resource directorate capacities for O&M and cost recovery	Without appropriate affordability measures, cost-recovery mechanisms or user-fee structures may disproportionately affect female-headed and low-income households, potentially limiting equitable access to climate-smart water services and reducing the long-term effectiveness and sustainability of these investments	Inclusion of women and other vulnerable groups' needs in cost-recovery structures for rehabilitated infrastructure Dedicated oversight by Gender and Safeguarding Specialist	Low	Gender & Safeguarding Specialist, Acted/MoLAE Rural Damascus and Countryside Water Resource Directorate	Y2-Y5	Indicator 1: # of consultation processes conducted with women and other vulnerable groups to inform cost-recovery options for rehabilitated infrastructure	Cost for mitigation measures are included within overall activity budgets
Give unfair advantages to certain individuals or groups - such as elites							



Activity 1.3.1 Participatory review and recommendations to the local water use regulatory framework	Strengthening climate planning may not fully reflect the distinct needs and roles of women and girls if gender considerations are not systematically integrated which will undermine sustainability of the investments.	Recommendations will include a review of existing legislation and consultations with women and WUA representatives to reflect community-level impacts on needs of vulnerable groups, including women.	Low	Gender & Safeguarding Specialist, Consultant	Y3	# consultations conducted with women and WUA female representatives to inform the review of proposed regulations and their community-level impacts	Cost for mitigation measures are included within overall activity budgets
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Performance Standard 2: Labor and working conditions

Fail to monitor labour risks in supply chains and subprojects

Activity 2.1.1 Climate-proof and upgrade public drinking water infrastructure	Activities 2.1.2, 2.1.3, 2.2.1 and 2.2.2 will require contractors, which necessitates mitigation measures to prevent and monitor labour risks in supply chains.	All suppliers will sign the ethical declaration in procurement contracts ensuring compliance with labour standards and Acted's Child Protection Policy	Low	Logistics Manager Acted/MoLAE	Before signing contracts	100 percent of contractors signed the ethical declaration	Costing for mitigation measures are included within overall activity budgets
Activity 2.1.2 Establish a robust leak detection and response system		Acted will monitor project sites during implementation to monitor any potential labour risks			During implementation	100 percent of sites where infrastructure rehabilitation/maintenance/upgraded activities are implemented will be monitored and any violations will be flagged and addressed through established reporting mechanisms.	
Activity 2.2.1 Installation of water-efficient fixtures							
Activity 2.2.2 Installation of small scale greywater recycling systems for							

Commented [MR24]: GCF: While activities are small-scale, there could still be engagement of workers and corresponding construction/rehabilitation health and safety risks to workers. Please consider them here in PS2.

Response: An additional row has been added to Annex 12A in track changes under PS2 to address this comment.

Commented [GCF-ESS25R24]: GCF: Noted with thanks.



household reuse							
Involve healthy and safety risks from physical, chemical or chemical hazards biological							
Activity 2.1.1 Climate-proof and upgrade public drinking priority drinking water infrastructure	Small scale rehabilitation works may potentially cause health and safety risks to workers	Acted's standard SoP for rehabilitation that includes managing dust through damping down of sites, coordination on access routes where water supply trenches are dug and use of appropriate and adequate PPE by people working at the site will be applied where necessary	Low	Acted/MoLAE	During Implementation	All Acted project sites are monitored and relevant measures to avoid occupational health and safety risks to workers are implemented and enforced	Costing for mitigation measures are included within overall activity budgets
Involve use of child labour							
Activity 3.1.2 Training on climate adapted agricultural practices Activity 3.1.4 Establish locally driven financing models	Activities 3.2.3 and 3.1.5 have a potential risk of involving child labour on farms due to prevalence of family farming.	All farmers supported by the project will be trained on Acted's Child Protection Policy Acted will monitor project sites during implementation to monitor any potential labour risks	Low	Acted/MoLAE	During Implementation	100 percent of agricultural plots/farms supported by the project will be monitored and any violations on child labour will be flagged and addressed through established reporting mechanisms.	Costing for mitigation measures are included within overall activity budgets
Performance Standard 3: Resource Efficiency and Pollution Prevention							
Release pollutants and chemicals that are toxic and harmful to the environment (eg release of chemicals used for water treatment, leak of contaminated water, leak of harvested water containing pesticides, leak of greywater)							
Activity 2.2.2 Installation of small scale greywater recycling systems for	The activity will not release pollutants and chemicals that are harmful to the environment.	Acted will train the households supported with greywater recycling systems on operation and maintenance of the system to avoid any	Low	Acted/MoLAE	Y2-Y5	100 percent of the beneficiaries receive training on greywater reuse, handling and reuse	Costing for mitigation measures are included within overall activity budgets

Commented [MR26]: GCF: Please consider potential risk for use of solar panels in water pumping activities in terms of management/disposal of end-of-life or damaged solar panels given its use is being considered.

Response: An additional row has been added to Annex12A in track changes under PS3 to address this comment.

Commented [GCF-ESS27R26]: GCF: Noted. Thank you.



household reuse		potential leaks to the environment.					
Activity 2.1.1 Climate-proof and upgrade public drinking priority drinking water infrastructure	The activity will not release pollutants and chemicals that are harmful to the environment during disposal of broken or at the end of life of panels	<p>Acted will train water station operators on safe disposal of broken or at the end of life of solar panels.</p> <p>Acted will also formalise agreements with certified recycling facilities to promote recycling of the solar panels.</p> <p>During procurement, Acted will consider longer-life panels and include clauses in the procurement contracts that require supplier take-back and or extended producer responsibility</p>	Low	Acted/MoLAE	Y2-Y5	<p>All operators provided with solarization O&M training</p> <p>Formal agreements signed with certified recycling facilities</p> <p>All purchased panels are longer life and supplier take-back, and extended producer responsibility is applied on solar panel procurement</p>	Costing for mitigation measures are included within overall activity budgets
Involve or will lead to high amount of consumption of energy, water and other resources							
Activity 2.1.1 Climate-proof and upgrade public drinking priority drinking water infrastructure	The activity is not designed to lead to high amount of consumption of energy and water resources since Acted will upgrade already existing boreholes using the existing designs.	<p>Acted will install water flow meters on all upgraded or maintained drinking water boreholes to monitor amount of water abstracted from each borehole.</p> <p>Water departments will be trained on capacity pumping tests and development of sustainable abstraction</p>	Low	Acted/MoLAE	Y2-Y5	<p>100 percent of the climate proofed boreholes are equipped with water flow meters</p> <p>100 percent of the climate proofed boreholes are provided with sustainable abstraction schedules</p>	Costing for mitigation measures are included within overall activity budgets



		schedules to avoid over abstraction.						
Activity 3.1.4 Establish locally driven financing mechanisms	The activity is not designed to increase consumption of water resources. The project will integrate mitigation measures to reduce the impact of expanded production by farmers.	Farmer associations will be supported with the development of sustainable and gender sensitive water abstraction plans and supported with flow meters to monitor abstraction. Farmers will be trained on water use efficiency and climate smart techniques. Each farmer will submit a business plan prior to accessing the grants/on-granting that will be aligned with the objectives of the project.	Low	Acted/MoLAE	Y1-Y5	100 percent of participating farmer associations are supported with the developed sustainable water abstraction plans. 100 percent of participating farmer associations are supported with the flow meters to monitor sustainable water abstraction plans. 100 percent of beneficiaries of the locally driven financing mechanisms have business plans aligned with the objectives of the project.	Costing for mitigation measures are included within overall activity budgets	
Performance Standard 4: Community health, safety and security								
Be in or near a conflict-affected or post-conflict area								
Crosscutting	Syria has experienced an extended period of crisis, but Rural Damascus governorate/ Eastern Ghouta, where the project operates, has been relatively stable under central government control. While some parts of	The project will apply a flexible and adaptive implementation approach, building on Acted's operational experience and local presence. Measures include: Phased and adaptive planning, allowing	Low	PMU	Y1-Y5	Daily security and access monitoring maintained	Costing mitigation measures are included within overall activity budgets	for are within activity

	<p>Syria may still face localized security or access constraints, the project area is secure. Nevertheless, temporary restrictions could affect staff movement, site access, or sequencing of field activities, including procurement, supervision, or community engagement. These are not expected to compromise overall project viability.</p>	<p>activities to be rescheduled, re-sequenced, or relocated in response to access constraints.</p> <p>Clear site-level go/no-go criteria prior to mobilization, including confirmation of safe access conditions.</p> <p>Continuous coordination with national, governorate, and local authorities to anticipate and respond to access issues.</p> <p>Use of decentralized implementation arrangements and local partners to minimize movement needs.</p> <p>Integration of security monitoring into routine project management, enabling timely operational adjustments</p>					
	<p>Community dissatisfaction or misunderstandings about project benefits</p>	<p>Acted will ensure community acceptance through engagement with local councils, water user associations, and other community structures.</p> <p>Clear communication of project objectives, timelines, and beneficiary</p>	Low	Acted/MoLAE	Y1-Y5	<p>All relevant stakeholders are consulted and engaged throughout the project cycle</p> <p>All community consultations include diverse members of the community, including women,</p>	<p>Costing for mitigation measures are included within overall activity budgets</p>



		selection criteria to avoid misunderstandings				vulnerable groups, and returnees	
Crosscutting	As post conflict environment, mine/UXO is widespread in Syria. As such, there is a possibility that some project locations, particularly areas where small-scale rehabilitations of boreholes, water networks, or micro-catchment structures may occur, could contain unexploded ordnance (UXO) or other legacy hazards.	Acted will only work in areas that have been cleared by UXO. Please refer to Annex 7 risk assessment and management for mitigation measures.	Low	PMU	Y1-Y5	Clearance confirmations for project sites.	Costing for mitigation measures are included within overall activity budgets
Increase health risks from waterborne or vector-borne diseases, communicable infections, or poor sanitation (e.g., due to stagnant water or pollution)							
Activity 2.2.2: Installation of small scale greywater recycling systems for household reuse	The activity is not expected to increase health risks from water-borne diseases.	<p>Greywater systems are household-level only, for site reuse of treated water, and will not discharge into surface or groundwater.</p> <p>Systems are simple, low-tech, requiring no chemical treatment and designed to prevent any cross-contamination with potable water</p> <p>Water from greywater systems will be used only on non-food crops</p>	Low	Acted/MoLAE	Y2-Y5	<p>100 percent of the beneficiaries receive training on greywater reuse, handling and reuse</p> <p>All the water quality samples meet the reuse criteria water quality standards</p>	Costing for mitigation measures are included within overall activity budgets

		Beneficiaries will receive training and clear operational guidance on handling, treatment, and reuse to prevent stagnation, cross-contamination, or misuse Water quality monitoring will be conducted to ensure treated water meets reuse standards					
PS 5: Land acquisition and involuntary resettlement							
Involve resettling people involuntarily and/or acquiring their land (e.g. for the creation of a strict nature reserve or reducing the threat of wildlife related incidents for communities living in reserves)?							
Activity 3.1.2 Training on climate adapted agricultural practices	Although the project does not involve land acquisition, physical or economic displacement, or restrictions on land use, inadequate verification of land access rights could, in theory, contribute to localised tensions or disputes among land users.	Acted will apply precautionary land-access verification measures for activities linked to agricultural practices or land-based interventions. This may include legal ownership documents, recognised lease agreements for the land on which project-supported activities are implemented. Community validation, and consultation with relevant local authorities will be conducted to ensure that supported activities do not take place on contested or disputed land. Activities will be excluded from locations where	Low	Acted/MoLAE	Y1 – Y5	All project-supported activities implemented on land with confirmed user or ownership rights	Costing for mitigation measures are included within overall activity budgets

		unresolved land ownership or access conflicts are identified.					
Activity 3.2.2 Restore degraded public land through revegetation with native plants	Potential conflict with local communities if they are using the land for farming	Acted will not acquire land or do any resettlement. For the activity, only public land verifying through consultation with the relevant stakeholder.	Low	Acted/MoLAE	Y1-Y5	Conduct community consultations in all targeted sites before planting to identify land use and access rights.	Costing for mitigation measures are included within overall activity budgets
PS6: Biodiversity conservation and sustainable management of living natural resources							
Affect water quality of surface or groundwater (e.g., contamination, increase of salinity) through irrigation/ agricultural run-off, water extraction practices, influence of livestock or other activities							
Activity 2.1.1 Climate-proof and upgrade public drinking priority drinking water infrastructure	The activity has been developed directly to ensure there is no over abstraction which leads to an increase of salinity	<p>Acted will only select existing boreholes.</p> <p>Acted will install water flow meters on all upgraded or maintained drinking water boreholes to monitor amount of water abstracted from each borehole.</p> <p>Water departments will be trained on capacity pumping tests and development of sustainable abstraction schedules to avoid over abstraction.</p> <p>The project will support ecosystem-based adaptation such as rehabilitation of recharge wells, infiltration trenches</p>	Low	Acted/MoLAE	Y2-Y5	<p>100 percent of the climate proofed boreholes are equipped with water flow meters</p> <p>100 percent of the climate proofed boreholes are provided with sustainable abstraction schedules</p> <p>Ecosystem-based adaptation activities to enhance groundwater recharge are implemented in key suitable areas of the project area</p>	Costing for mitigation measures are included within overall activity budgets

Commented [MR28]: GCF: Positive impacts such as Ecosystem-based adaptations such as rehabilitation of recharge wells, infiltration trenches and revegetation activities will be supported further answer to the concern around declining groundwater level through introduction of nature-based solutions." may also be stated here.

Response: Thank you for highlighting this. This has been reflected now in the ESAP table in track changes.

Commented [GCF-ESS29R28]: GCF: Noted with thanks.

Commented [MR30]: GCF: Output 3.1 states that "Capacities of extension services and agricultural research centre will be strengthened through ToT training for 40 staff and provision of equipment to ensure the long-term functionality. Third, in kind support and training for at least 50 staff will be provided to the General Organisation for Seed Multiplication (GOSM), and public nurseries in Rural Damascus for strengthen a local supply of drought resistant seeds." Please describe is potential for invasive species or use of GMOs may occur and how will the programme manage these risks, if any. How do you ensure that this risk is mitigated. Please indicate here if relevant.

Also 3.2 states "MoA's nurseries in Eastern Ghouta will be supported to strengthen production of pasture and forest seedlings". How do you ensure there is no maladaptation?

Response: There is no risk of invasive species introduction or use of GMOs. All nurseries involved are ...

Commented [GCF-ESS31R30]: GCF: Thank you for the clarification. We recommend that the response be included in the narrative under PS6 in the main text. Thank you.

Commented [MR32R30]: Acted: The above clarification has now been included in the narrative under PS6 in the main text accordingly.

		and revegetation activities to enhance ground water recharge					
PS8: Cultural heritage							
Involve development of infrastructure (e.g. earthworks, small water infrastructure) or construction of buildings (e.g. community centre) that might affect known or unknown (buried) cultural resources?							
Activity 3.1.2 Training on climate adapted agricultural practices	There are no heritage sites identified in the project area, however compliance with the antiquity law will mitigate any potential risks and demonstrate due diligence regarding cultural heritage.	Acted will engage with local stakeholders and conduct community engagements to ensure that supported demonstration plots are not at known cultural resources.	Low	Acted/MoLAE	Y1-Y5	100 percent interventions sites were decided in collaboration with the community leaders	Costing for mitigation measures are included within overall activity budgets
Affect in-tangible cultural resources of local communities such as values, norms, practices, traditional knowledge, language, literary or artistic creation? Also consider the risk of neglecting customary management							
Cross Cutting	Activities including capacity building trainings, and knowledge sharing which may diverge from existing local knowledge systems and cultural practices.	Engagement with local stakeholders relying on community outreach and consultations throughout the project lifetime to ensure cultural sensitivity so that the design and implementation of the activities do not have negative impacts on existing cultural practices Integrate local knowledge into technical designs Translate all training material into local language (Arabic)	Low	Acted/MoLAE	Before and during project implementation	100 percent of intervention areas will involve regular community consultations	Costing for mitigation measures are included within overall activity budgets



4.1 SEAH risk mitigation plan

To fully assess potential SEAH risks linked to the project, Acted used the GCF SEAH risk assessment toolkit. This entails screening: i) basic risk mitigation measures; ii) contextual level risks; iii) project-level risks. Based on the results of this screening and combined with the ESS tool specific SEAH project risks were then identified linked to the project activities. These risks were assessed for likelihood and potential impact, with a resulting mitigation plan elaborated.

The results of these varying layers of risk analysis are presented below:

Table 3:SEAH risk screening

Ensuring basic risk mitigation measures are in place ahead of stakeholder engagement	Responsibility	Comments
Does the AE have a SEAH Policy (or SEAH provisions in another policy)?	AE	Yes, Acted has a dedicated Policy on Protection from Sexual Exploitation, Abuse and Harassment, aligned with international standard.
Does the AE have an employee Code of Conduct?	AE	Yes, Acted has an organisation-wide Code of Conduct defining expected behaviours, prohibited conduct, reporting obligations and disciplinary measures, which is binding on all employees and associated personnel.
If the AE has contracted out stakeholder consultations, does that entity have a SEAH Policy (or are they contractually bound to apply the AE's)?	AE / Consultant	Yes. All Acted partners and subcontracted entities involved in stakeholder consultations are required either to have an internal SEAH / Safeguarding policy aligned with international standards or to formally commit, through contractual clauses, to applying Acted's SEAH Policy and Code of Conduct. Acted Syria's assesses the PSEAH capacities of all partners and supports them, where needed, in developing or strengthening a tailored SEAH Improvement Action Plan. Suppliers are contractually required to comply with Acted's ethical standards, including PSEAH requirements, and those with direct contact with local communities receive targeted PSEAH briefings as operationally relevant.
If the AE has contracted out stakeholder consultations, does	AE / Consultant	Yes, all associated entities and their personnel engaged in



that entity have an employee Code of Conduct (or are they contractually bound to apply the AE's)?		stakeholder consultations must sign and comply with Acted's Code of Conduct , which sets out clear behavioural standards, prohibited conduct, reporting obligations and sanctions in case of breaches. Compliance is reinforced through contractual obligations, induction briefings, and targeted PSEAH awareness sessions. Acted Syria monitors adherence during implementation and may apply corrective measures, including suspension or termination of contracts, in case of non-compliance.
Have AE employees and consultants conducting stakeholder consultations been trained on preventing SEAH and the Code of Conduct?	AE / Consultant	Yes. All Acted Syria staff receive mandatory Code of Conduct and PSEAH training at least once a year. All new staff undergo safeguarding and PSEA induction. MEAL and program teams receive enhanced training on complaint handling and survivor-centred approaches. Prior to each field mission, PSEAH briefing are delivered. Daily workers and enumerators are trained prior to deployment. Suppliers also accept Acted's ethical standards including PSEAH standards in the signature of their contracts. Suppliers accept Acted's ethical and PSEAH standards through contractual commitments, and targeted briefings are provided to those with direct community interaction.
Does the AE have a grievance mechanism in place in case of early SEAH complaints from stakeholder engagement?	AE	Yes. Acted has multiple safe and confidential reporting channels: (1) internal Transparency Line and confidential email (transparency@acted.org) for staff, suppliers and partners; (2) community feedback mechanism (the Acted Feedback Mechanism – AFM) with multiple entry points (toll-free hotline, community accountability focal points, MEAL staff on site). Communities are informed before every activity

		about expected humanitarian staff behaviour and available reporting channels. PSEAH visibility materials are systematically displayed (Acted Syria developed key messages using the Interaction Toolkit, PSEAH Frontline Toolkit, Syria PSEA Network key messages, and IASC Six Core Principles.).
Does the AE have a specialist on staff who can undertake the more advanced assessment in Stage 4 and deal with SEAH complaints?	AE	Yes. The mission has both national safeguarding / PSEAH focal point and international Transparency, Compliance and Investigation staff. Acted HQ also provides dedicated PSEAH expertise. Budget is required to fund Gender and Safeguarding Specialist over the full project duration.
Contextual Level (and Baseline Conditions)	Responsibility	Comments
Does the country have laws prohibiting sexual harassment / stalking generally?	National/State law (Gender Assessment)	Yes. Syrian panel code, Decree 148/1949
Do labour laws prohibit sexual harassment in the workplace?	National/State law (Gender Assessment)	No explicit provision in the current labour law addressing workplace sexual harassment.
Does the country have laws prohibiting intimate partner violence (IPV)?	National/State law (Gender Assessment)	No explicit provision in the current law about IPV.
What is the prevalence of GBV in the country?	National statistics (Gender Assessment)	While national wide statistics are unavailable, the 2025 Humanitarian Response Priorities document highlights high prevalence of GBV with 93 percent of those requiring assistance being women and girls.
What is the legal age a person can marry?	National law	The legal age for marriage is governed by Personal Status Law No. 59 of 1953. 18 years for Men, and 17 for Women.
Despite any laws, what is the prevalence of child marriage in the country?	National statistics	There are no up-to-date data on prevalence of child marriages. However, it is estimated that over 24 percent of women in Syria were married before age 18. ²

² United Nations, (2025), Syria common country analysis: 2024 update. Available [here](#).

What is the income level of the country?	World Bank ranking (H, HM, M, LM, L)	24.8 percent of Syrians consume below the low-income country poverty line (2.15\$ per capita per day) and 67 percent of the population live below the lower middle-income poverty line (3.65\$ per capita per day). Syria ranks within the low-income economies (under 1,135USD/capita) according to World Bank.
Where does the country rank on global gender indices?	World Bank Reports / Other	Syria is not included in the Global Gender Gap Report 2025 of the World Economic Forum due to lack of available data. In 2021 (last report Syria appeared in), Syria ranked 152 nd out of 156 countries assessed.
Is there a national action plan on GBV and/or sexual harassment?	National government	No. There is no specific strategy or national action plan addressing GBV yet.
Does the country have specialized services for survivors of GBV (at both the national and local level)?	Local gov / NGOs	There are limited specialised services in Rural Damascus provided by humanitarian NGOs and the UN identified in the national GBV service-mapping.. Accessibility remains very limited especially outside major cities.
Is the country currently experiencing war, internal conflict or humanitarian disaster?	National / Media	Syria is exposed to multiple humanitarian crises including internal displacements, sporadic flare up of armed conflict, climate disasters and epidemic outbreaks.
Project level risk	Responsibility	Comments
Are women concentrated in lower paid roles and mostly line-managed and supervised by men?	AE	Based on existing gender dynamics in Syria and Acted's existing HR trends, women are likely to be concentrated in lower paid positions and to be managed by men. The limited educational opportunities for women and higher burden of domestic work means that women are less likely to be on the formal workforce market nor to have medium-high technical expertise.
Are piece-rate systems or other performance-related pay structures used where individuals are in	AE	No. The payment of workers is based on Acted's internal salary grid or daily worker wage memo. The value amounts are decided at



control of how much other workers get paid?		Country Coordination level and approved in coordination with Acted HQ.
Will project workers have control over life-changing resources such as compensation or access to basic or highly sought-after resources?	AE	No.
Will security personnel be used? Will they be armed?	AE	Acted contracts security guards to ensure the guarding services of Acted office premises in Syria. The security guards are unarmed, in line with humanitarian principles and Acted's internal policies.
Will there be an influx of male workers into the project area?	AE	This is probable, as individuals often relocate to areas where work opportunities are available. Knowing that the majority of the country's formal workforce is composed of men, it is possible that many employment posts related to the project will be taken by men.
Are local communities poor and lacking basic resources?	AE	Yes. The project targets the Rural Damascus governorate which includes many communities that continue to be characterised by poverty, destruction of infrastructure, fragile livelihoods, food insecurity, and high returns of internally displaced people and refugees.
Will migrant workers be employed by the project?	AE	While employment opportunities will not discriminate based on migration status, it is unlikely that migrant workers will be hired on the project.
Will project workers all have formal contracts?	AE	Yes, all people that will receive a remuneration linked to project work will sign a formal contract with Acted, either through employee contracts or through daily work conventions.
Will goods frequently be transported over long distances, especially through poor and/or remote communities?	AE	Some project procurement will take place in urban centres with adapted markets, with goods then transported to the project locations – which are pre-urban and rural areas. The governorate is however, situated close to the capital city and therefore the

		distances are not expected to be long.
Are worksites or project activities based in remote locations?	AE	No.
Will project workers live in the community or in worker housing?	AE	Acted only provides housing for its international staff (guesthouse usually located within, or near the office premises). National staff are free to find housing wherever they wish.
Will workers be required to travel long and potentially unsafe distances?	AE	Depending on the role, some Acted staff will be required to travel to undertake field missions, travelling between various bases of the project. Security and road conditions vary depending on the location.
Will the project operate in highly pressurised work environments, with tight deadlines?	AE	The project is a long-term, implemented over a 5-year period. Hence, it is not expected that the work environment will be particularly pressurised, unlike for emergency/pure humanitarian projects (which Acted Syria has extensive experience in implementing).
Is the project located within a male-dominated sector where female workers will be employed?	AE	The formal workforce in general in Syria is dominated by men. The project will focus on the water and agricultural sectors. While the water sector is heavily male dominated, the agricultural sector has high concentration of women in certain positions related for example to irrigation. Women provide much of the labour force during harvest, yet women's involvement often remains informal, artisanal, and under-recognised. In the livestock sector, women's role is concentrated in less profitable activities with limited market access, while men retain control over assets, sales, and decision-making.
Have communities voluntarily raised concerns in relation to SEAH/GBV during consultations?	AE	No. However, according to Acted's gender assessment (Annex 4), there is a major trend in underreporting and normalisation of insecurity. As such, a lack of



		concerns being voluntarily raised does not equate an absence of concern.
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Table 4: SEAH risk mitigation plan

Activities	Summary of SEAH/ Harassment Risks	Mitigation Measures	Likelihood (score)	Impact (score)	Responsible party/ person
CROSSCUTTING Internal workforce (EEs) – recruitment, induction, daily operations)	A gender-imbalanced workforce (approximately 80% men) may reinforce power imbalances, increasing the risk of sexual harassment or abuse between staff, quid pro quo dynamics in recruitment or performance management, boundary violations in closed office settings, and bullying or retaliation against complainants.	Mandatory PSEAH induction and annual refresher training for all staff; signed Code of Conduct; gender-balanced, two-person recruitment and selection panels; trained and accessible PSEAH focal points in each field base to receive, document, and escalate complaints confidentially; survivor-centred investigation procedures led by trained and independent personnel; annual staff discussion sessions (women-only, and men-only) to reassess risks and reinforce accountability; confidential and multi-channel reporting mechanisms.	Low	High	HR Manager, Gender and Safeguarding Specialist
CROSSCUTTING Field missions & travel (mixed teams)	Sexual harassment or abuse may occur during travel, transport, or accommodation arrangements, particularly in mixed-gender teams.	Gender-sensitive safe travel and accommodation SOPs; approved transport and lodging only; confidential and anonymous reporting channels available during missions; clear escalation and response procedures.	Low	High	Area Manager, Country Coordination
CROSSCUTTING Contractor management (consultants,	Contractor-to-staff or staff-to-contractor sexual harassment or abuse, and sexual exploitation and abuse of community	All contracts include binding PSEAH clauses aligned with the Acted Code of Conduct; mandatory PSEAH training for contractors prior to deployment; designation of trained	Low	High	Logistics Manager, Gender and Safeguarding Specialist



enumerators, guards, drivers)	members by contractors engaged by the project.	PSEAH focal points by contractor firms; routine spot-checks and supervision; immediate suspension of alleged perpetrators pending investigation; confidential reporting mechanisms accessible to communities and staff; survivor-centred referral pathways to health, psychosocial, and legal services.			
CROSSCUTTING M&E	Enumerator or MEAL staff may engage in sexual harassment, coercive data collection practices, or SEAH toward community members; misuse of sensitive data may expose survivors; male-dominated teams may increase risks during FGDs or consultations.	Mandatory PSEAH training for enumerators and MEAL staff; gender-balanced; prohibition of one-on-one interviews in isolated settings; safe, public venues and daytime data collection; informed consent procedures including PSEAH information and reporting options; data minimisation and survivor data protection SOPs; secure data storage; debriefings and safeguarding follow-up after field activities; clearly communicated and accessible reporting channels.	Low	High	Gender and Safeguarding Specialist, MEAL Manager
Activities 1.2.2, 3.1.1 related to support to communal governance structures, accountability mechanisms and forums	Male-dominated institutional environments may marginalise women and youth, creating power imbalances that increase the risk of sexual harassment during travel, meetings, or professional networking, and may discourage reporting or undermine survivor-centred responses in public or mixed-gender settings.	Display of safeguarding rules and confidential and multi-channel reporting mechanisms in meeting rooms; mixed-team facilitation where appropriate.	Low	High	Program Manager, Gender and Safeguarding Specialist



Activities 2.2.1, 2.2.2, 3.1.2 related to household level installations and training of farmers, extension and environmental workers	Sexual harassment or abuse by trainers, technicians, or extension staff (male-dominated teams); unsafe travel to training or household-level service delivery; quid pro quo for participation, targeting, or access to household installations or maintenance; pressure on female participants or household members by male staff; SEAH risks in isolated demonstration plots or private household settings.	Transparent and publicly communicated participant selection criteria; prioritisation of female trainers and programme staff; training conducted in visible, public locations; prohibition of one-on-one interactions in isolated settings; clear protocols for household-level visits and service delivery, including advance scheduling, paired visits, and explanation of purpose; PSEAH key messages and reporting options explained at the start of each session and prior to household-level works; trained PSEAH focal points on-call during activities; consultation with women on safe locations and session timing; group travel arrangements where needed; community-accessible reporting channels.	Low	High	Project Manager, Gender and Safeguarding Specialist, MEAL Manager
Activities 3.1.4, 3.2.1, 3.2.2 related to locally driven financing mechanisms and paid communal works	Quid pro quo demands in grant or on-granting approval processes, and selection for paid communal works; favouritism or exclusion; retaliation against un/successful applicants or complainants.	Independent multi-person panel scoring and verification processes; separation of assessment and verification functions; post hoc published selection criteria and feedback to applicants; accessible grievance and appeals mechanisms; MEAL audits and spot-checks; sanctions for misconduct.	Medium	High	Project Manager; MEAL Manager



The SEAH risks identified in the risk analysis table above may affect women, men, girls, and boys, though in the same way and the same extent.

- Women and girls are disproportionately exposed to SEAH risks, particularly in rural communities targeted by the project where:
 - Social norms may limit women and girls' decision-making power and mobility.
 - Women and girls interact frequently with project staff (training, household level water saving and reuse, community governance structures).
 - Women and girls may rely on male staff for access to resources (e.g access to financial assistance), creating power imbalances that can lead to SEAH

Girls, especially adolescent girls, face additional vulnerabilities notably when participating in mixed-gender youth or farmer training activities, where age, gender and authority differentials may further increase exposure to SEAH risks. Men and boys may also be affected, although generally to a lesser extent. Identified risks include sexual harassment in male-dominated work environments and social or cultural pressures that discourage disclosure or reporting due to stigma. Additionally, SEA and sexual harassment risks may arise among project staff themselves. Given that the technical workforce in Syria remains predominantly male, risks include misuse of authority, harassment between staff members and the normalisation of inappropriate or discriminatory behaviours if not adequately addressed. This differential risk analysis directly informs the mitigation measures outlined above, which are designed to address gender- and age-specific vulnerabilities, reduce power imbalances, and ensure safe, accessible and survivor-centred reporting and response mechanisms across all project activities.

4.2 SEAH risk mitigation costing

In order to implement the SEAH risk mitigation plan outlined in section 3.4 above, the following financial inputs are incorporated into the project budget:

	Quantity	Unit	Sub-frequency	Unit	Global frequency	Unit	Unit costs USD	% allocated	Total USD
Gender and Safeguarding Specialist	1,00	person	12,00	month	5,00	year	2,500 USD	100%	145,000 USD
Training costs (including safeguarding and protection)	1,00	lumpsum	1,00	lumpsum	5,00	year	2,000 USD	100%	10,000 USD
Visibility/media (including safeguarding and protection)	1,00	lumpsum	1,00	lumpsum	5,00	year	1,000 USD	100%	5,000 USD



5. ESAP Implementation arrangements

The overall implementation of the ESAP for the project is overseen by Acted Syria in its capacity as Executing Entity, which has undertaken the environmental and social screening across all project activities and holds primary responsibility for ensuring ESAP mitigation measures are applied across all implementing actors (including sub-grant recipients and third-party implementors).

Acted will ensure these stakeholders also comply with E&S requirements through a combination of formal agreements, upfront screening and ongoing oversight. At the institutional and governance level, E&S compliance obligations are formalised through the arrangements between Acted Syria and MoLAE as the two Executing Entities outlined in the Term Sheet (Annex 6). The operational manual will further define roles, responsibilities and E&S compliance requirements. Grant agreements with sub-grantees will embed ESAP obligations. At community level, sub-grants to CSOs will facilitate participatory monitoring, providing an accountability layer that complements direct oversight functions.

Day-to-day implementation of the ESAP will be overseen by the project Water and Environment Technical Coordinator in close coordination with the Gender and Safeguarding Specialist. Both roles sit within the project implementation team and report to the Project Director who ensures that activities are correctly implemented at provincial level by program teams. These focal points coordinate directly with the PMU, which holds operational oversight across all project components and convenes quarterly. Where ESAP compliance issues are identified, they can be escalated through the PMU to the TWG for technical guidance on safeguards compliance, and where necessary, to the PSC chaired by MoLAE for strategic guidance and corrective action, as outlined in Annex 2 Section 10.

Acted will also ensure that all implementation requirements for specific activities that are sub-granted are flowed down to the IP through sub-grant agreements and followed up as part of the IP reporting requirements. This will be further reinforced through the operational manual.

The monitoring of the ESAP mitigation measures will be integrated into the project's overall MEAL plan and activities. The learning and tracking of progress on expected results related to these measures will be incorporated into routine MEAL data collection. Expected results and indicators will be added to Acted's internal MEAL framework at the project inception stage, with responsibility for monitoring relevant indicators shared among MEAL, Program, FLATS, and Finance teams from both Acted and its partners. Specific responsibilities include:

- Capacity building - Delivering **targeted training** to Acted staff and implementing partners on ESAP mitigation measures, in close coordination with the Gender and Safeguarding Specialist to ensure integration of gender-responsive and socially inclusive approaches.
- Community engagement and monitoring - Conducting **community surveys, KIIs, FGDs** led by the MEAL team, to assess the effectiveness of mitigation measures and capture beneficiary feedback.
- Knowledge assessment - Implementing **pre- and post-tests** administered by program and MEAL staff to track knowledge improvements and the effectiveness of training activities.
- Compliance and documentation - Establishing a system to **document, track, and verify the application of mitigation measures**, including input-related actions and the use of filtering and selection criteria
- Feedback and grievance redress - Utilizing the **AFM** for systematic tracking and response to community feedback and grievances, as further detailed below.

Commented [MR33]: GCF: Please relate and synchronize the ESAP implementation arrangements with what is discussed in the Section B.3 of Funding Proposal (Implementation Arrangements). For instance, where will these personnel be lodged? Will they be at the PMU or at the EE, etc. and how will they coordinate on their E&S functions and responsibilities.

Response: Acted as EE has undertaken the ESS on all activities and will be ensuring mitigation across all actors. The section has been updated with track changes to reflect these implementation arrangements, as outlined in Section B.3 of the Funding Proposal.

Commented [GCF-ESS34R33]: GCF: Noted with thanks. Please also note on the recommendation to possibly include here the clarification/response provided in page 17.

Commented [MR35R33]: Acted: The clarification/response provided in page 17 has now been integrated into this section.

6. Stakeholder engagement

Stakeholder consultations were conducted between June and December 2025 at national, governorate, and community levels as part of project preparation. Stakeholders consulted included relevant government departments, research institutions, NGOs and UN agencies, local authorities, farmers, women and youth groups, and community representatives, including vulnerable households. A full list of stakeholders is provided in Annex 2, Section 9.2.

SEAH-related risks were discussed during consultations with government ministry stakeholders. These discussions included exchange on existing SEAH prevention and response mechanisms in place within relevant ministries and shared recognition of the importance of having function SEAH prevention and follow-up mechanisms in place at institutional levels.

The environmental and social concerns raised by the stakeholders consulted are summarized in the table below.

Table 5: Summary of stakeholder concerns

Stakeholder	Environmental and Social Issues raised	Project component which addresses issues raised
Government departments	Water scarcity and drought	1,2,3
	Poor recharge and over abstraction of groundwater leading to declining ground water levels, drying wells and high salinity	1,2,3
	Reduced river flows	1
	High prevalence of unlicensed and unrecorded boreholes	1
	Absence of current groundwater data	1
	High prevalence of non-functional boreholes	1,2
	Limited technical resources (equipment and human resources) to support integrated water resources management	1,2,3
	Outdated regulatory framework on water use	1
	Dilapidated and inefficient public water supply networks	2
	Absence of cost recovery mechanisms, high-water losses and non-revenue water for public water supply	2
	Use of traditional irrigation practices	3
	Weak water governance structures at local level	1
	Loss of vegetation cover	3
	Unaffordable water supply through private water trucking	1,2
Research Institutions	Lack of collaboration between research institutions and projects on climate adaptation	1
	Water scarcity due to prolonged and frequent droughts	1,2,3
NGOs/UN	Need for collaboration on integrated water resources management and groundwater monitoring	1
	Limited groundwater data	1
	Need for locally led adaptation measures	1
	Institutional capacity building	1,2,3
	Declining groundwater levels	1

Commented [MR36]: GCF: Please also discuss the who, when, where, what - will be the stakeholder engagement strategies and approaches during implementation of the programme.

Response: The stakeholder engagement strategy during implementation has been reflected in this Section to describe the specific approaches and scope of engagement across all project components and different levels, as outlined in Annex 2 already. This includes coordination mechanisms with line ministries, participatory community engagement processes, dedicated outreach to women, youth, and vulnerable groups, and cross-cutting oversight through the Gender and Safeguarding Specialist and MEAL-led monitoring.

Commented [GCF-ESS37R36]: GCF: Noted with thanks.

Community level stakeholders	Limited capacity on climate smart agriculture	3
	Water scarcity due to prolonged drought and reduced rainfall	1,2,3
	Agricultural livelihoods loss due to climate change	3
	Community decision-making on water, land, irrigation and grazing predominantly male-led	1
	Limited technical knowledge and landownership by women and poor households contributing to poor participation in decision making for the management and allocation of resources	1,3
	Water scarcity contributing to limited community-level water management and governance arrangements	1,3
	Constrained institutional resources for local water governance structures.	1
	Unequal climate change vulnerabilities among population groups with displaced households, widows, female-headed households, landless or smallholder farmers, and poor families facing greater difficulty adapting	2,3
	Unavailability of local external or institutional agricultural support	3
	Declined livestock due to lack of pasture, animal illness, and unaffordable feed	3
Farmers	Low capacity of farmers on climate smart agriculture	3
	Desertification	3
	Limited availability of improved climate resilient seed varieties	3
	Absence of credit systems	3
Women and young people	Heightened effects of climate change on women and female headed households.	1,2,3
	Exclusion of women in meetings and decision making due to limited knowledge on water and climate-related issues	1,3
	High economic and social vulnerability for women limiting their adaptive capacity to climate change	1,3
	Tokenistic participation of women in decision-making processes with men retaining the final say	1,3
	Limited assets ownership by females due to inheritance practices, economic constraints, and high asset prices	2,3
	Pre-dominantly informal and inconsistent women's participation in decision making, with more women engagement in water management at household level	1

Consultations highlighted how climate change acts as a risk multiplier in the Barada and Awaj basin, exacerbating pre-existing environmental and social vulnerabilities. Key concerns consistently raised across stakeholder groups included increasing water scarcity due to prolonged droughts, declining groundwater levels driven by over-abstraction and limited recharge, lack of reliable hydrological and climate data, limited community water governance structures, and limited institutional capacity for integrated water resources management. At community level, stakeholders emphasized the unequal impacts of water scarcity on women, female-headed households, displaced and returnee households, and smallholder farmers, as well as limited participation of women and youth in water-related decision-making.



The proposed project is designed to address many of the environmental and social issues raised by stakeholders, particularly those related to climate variability, water scarcity and weak technical and institutional capacities. The project mirrors and is aligned to the adaptation priorities in the Syrian national policies and commitments. Furthermore, stakeholder engagement will continue throughout all five years of project implementation at different levels, building on the consultations conducted during project preparation.

Component 1 addresses gaps in data availability, coordination, and institutional capacity through basin-wide groundwater monitoring, climate-informed modelling, and strengthened, inclusive water governance mechanisms. Activities under this component will include generating and integrating ground and surface water monitoring, land-use data, and climate projections into decision-support tools for adaptive water allocation and drought preparedness. Establishment and strengthening of institutional capacity at national, governorate, and community levels to analyse and utilize climate data for climate-resilient water management will also be done under this component. Additionally, climate-informed decision-making will be institutionalized through strengthened governance structures, clarifying roles and responsibilities, and improving coordination among stakeholders. Technical support through trainings and equipment support will also be done. Stakeholder feedback on weak participation and accountability informed the design of gender-responsive governance structures and community accountability mechanisms, ensuring meaningful engagement of women, youth, and vulnerable groups in water planning and decision-making. The component also aims to support the Government of Syria to support systems to mobilize additional climate finance, leveraging GCF resources for long-term resilience building.

Continued stakeholder consultation will take place throughout Component 1: MoLAE as EE will lead coordination with key national and governorate-level institutions - including MoE, MoA, and the General Commission for Water Resources - on groundwater monitoring, climate modelling, and data integration throughout the project. Governance strengthening activities will be front-loaded in the beginning of the project to support inclusive water governance structures from the outset. At the community level in Eastern Ghouta, CSOs will facilitate participatory processes, with dedicated engagement sessions ensuring the meaningful participation of women, youth, and vulnerable groups in water planning and decision-making.

Component 2 responds to concerns related to deteriorated water infrastructure, high non-revenue water, unaffordable water supply, and weak service delivery by climate-proofing priority water systems, reducing losses, and strengthening government-led operation, maintenance, and cost-recovery mechanisms. Community consultations informed the focus on household-level water efficiency and greywater reuse, with explicit measures to ensure gender-responsive design and equitable access for female-headed and vulnerable households.

Continued stakeholder consultation will take place throughout Component 2: Community consultations will be conducted through dedicated community engagement mechanisms supported under the project to inform the prioritisation and design of water infrastructure interventions, with explicit attention to the needs of female-headed and vulnerable households. Local water departments will be engaged throughout implementation on operation, maintenance, and cost-recovery mechanisms, building local ownership and ensuring the sustainability of rehabilitated infrastructure beyond the project period.

Component 3 addresses stakeholder concerns related to declining agricultural productivity, desertification, and lack of agricultural support by promoting climate-adapted and water-efficient agricultural practices. Local farmers will be supported to adopt water-efficient and climate-smart practices, reducing pressure on shared groundwater resources, whilst sustainable financing



options for the adoption of these practices will be provided. Dedicated consultations with farmers and women informed the design of targeted training, financial support mechanisms, and inclusive participation arrangements. Farmer associations will be capacitated with tools to monitor agriculture water abstractions and inclusivity will be promoted by organizing dedicated sessions for women farmers and supporting their inclusion in farmer associations coordination mechanisms. Ecosystem-based adaptations such as rehabilitation of recharge wells, infiltration trenches and revegetation activities will be supported further answer to the concern around declining groundwater level through introduction of nature-based solutions.

Continued stakeholder consultation will take place throughout Component 3: Farmer associations will be engaged as primary accountability structures for agricultural water monitoring, with capacity building initiated early in implementation. Dedicated consultation and training sessions will be organised specifically for women farmers, and their active inclusion in farmer association coordination mechanisms will be promoted throughout the project. Smallholder farmers will be engaged through participatory planning processes to inform the selection of climate-adapted seed varieties and financial support mechanisms. Community consultations will also guide the selection of revegetation and ecosystem restoration sites under Output 3.2, ensuring alignment with local land use practices, grazing needs, and socioeconomic realities.

Across all components, the Gender and Safeguarding Specialist will oversee the inclusiveness and gender-responsiveness of engagement throughout implementation. Community surveys, key informant interviews, and focus group discussions led by the MEAL team will be used to monitor engagement effectiveness and capture beneficiary feedback for adaptive management.

Across all project components, Acted applies a **sensitive facilitation protocol** to its community consultations. Acted acknowledges that any sensitive discussions may expose participants to risk if not handled appropriately. Accordingly, the project applies a survivor-centered, do-no-harm, and confidentiality-based approach. This includes safe and appropriate and consent-driven discussion formats (including gender-segregated discussions as needed), use of trained facilitators, confidentiality, anonymized data handling, and referral pathways where sensitive protection concerns arise. Grievance redress will be available to all stakeholders through Acted's gender and culturally sensitive feedback mechanism (as outlined in Section 7 below), with issues systematically channelled through the PMU and escalated to the TWG or PSC as needed, and comprehensive PSEAH protocols will be enforced (as outlined in Section 8 below)

7. Accountability to affected populations

7.1 Overview of Acted's grievance redress mechanism (GRM)

Acted strives to meet the highest quality in its humanitarian and development projects and seeks to work with the affected populations in the best way possible, in an open and responsible way which builds trust and respect. Accountability is one of Acted's organisational principles, and Acted's approach is aligned with the IASC's Five Commitments to Accountability to Affected Populations (AAP): (1) leadership/governance; (2) transparency; (3) feedback and complaints; (4) participation; (5) design, monitoring and evaluation.

In addition to GCF's independent redress mechanism, Acted will implement its own accountability system - the Acted Feedback Mechanism (AFM), formally known as the Complaints and Response Mechanism (CRM). The AFM is a formalised procedure and mechanism that provides



a safe, accessible and effective channel for communities served by Acted to raise complaints and concerns and for a response or redress to be given. The AFM helps Acted to understand our programmes from the perspective of project participants and other key stakeholders, giving Acted additional information to identify any issues and adjust its programmes to best meet community needs. It is managed independently of project implementation teams, by the MEAL unit in-country, and supported by dedicated Accountability staff at Acted HQ.

The following are key priorities in our approach to accountability:

- **Transparency:** Providing honest, accessible and timely information to stakeholders, particularly project beneficiaries, and explaining our organisational procedures and activities.
- **Participation:** Enabling key stakeholders, particularly beneficiaries, to play an active role in decision-making about processes and activities that affect them. Ensuring that community preferences and priorities are taken into account in Acted's work.
- **Evaluation:** Ensuring that community feedback informs the lessons learned and best practices which feed back into Acted's corrective action in ongoing projects and design of future programmes to ensure continuous improvement.
- **Confidentiality and trust:** Confidentiality is crucial in reassuring people who submit a complaint on the AFM that there will be no reprisals, retaliation, blame or punishment from Acted, or from other actors, against any person who speaks up through the AFM. The facts and nature of the complaint, the identity of the key participants and the investigation records are all confidential, and information will be shared only with a very limited number of people whose actions are absolutely required to solve the issue raised in the complaint. Complainants can also choose to remain anonymous.

7.2 Gender-sensitivity and cultural sensitivity within Acted's GRM

The AFM is designed in a gender responsive and culturally appropriate manner which allows for grievances to be processed pursuant to the environmental and social safeguards standards, Environmental and Social Policy, and the Indigenous People's Policy of GCF. To ensure accessibility for diverse groups, including women, persons with disabilities, older persons, and individuals with limited mobility, the AFM provides multiple reporting modalities adapted to the local context, including WhatsApp channels, complaint boxes, complaint desks, email, direct engagement with MEAL and accountability staff, and verbal reporting through field teams.

For this project, gender-sensitive communication channels include female focal points amongst staff to receive gender-related grievances from affected populations. Awareness raising and providing information on the AFM is also conducted in a gender-responsive manner, ensuring that sensitisation materials include illustrations detailing unacceptable staff behaviour and available AFM communication channels to raise grievances with Acted.

Acted's safeguarding protocols for complaints related to sexual exploitation, abuse and harassment (SEAH) include an internal Acted investigation mechanism and an external pathway for referral. SEAH-related complaints received through the AFM are immediately transferred to country coordination for review and sent to the HQ Transparency, Compliance and Investigation (TCI) department for further investigation. Please refer to Section 8 below for full details of Acted's reporting mechanisms for SEAH cases.

For external pathways, Acted refers non-Acted-related grievances on SEAH to relevant protection actors with complainant consent, integrating existing national grievance mechanisms within Acted's GRM strategy whenever feasible.



Standardised AAP questions are included in all needs assessments to collect information on preferred communication methods, existing formal or informal grievance mechanisms in the community, potential barriers regarding language, literacy and vulnerable populations.

Any language barriers identified are overcome by the provision of interpretation and translation services provided by Acted where needed. All grievances received through the AFM, including those submitted by affected or potentially affected communities, will be addressed promptly (within 15 working days) through an accessible, fair, transparent, and constructive process, and without retribution to the individuals, groups, or communities that raised issues or concerns. Acted ensures this by giving the option to complainants to submit a grievance anonymously, understanding that complainants may still fear retaliation. Any grievances relating to social or environmental risk are anonymised and publicly available on Acted's AAP webpage. In cases where a complainant is not satisfied with the resolution of their grievance, the treatment of the grievance can be escalated to the HQ Accountability Unit, which is managed under the Programme, Impact and Accountability direction of Acted, for re-examination and oversight.

Confidentiality is upheld in the collection, processing and treatment of all grievances, with information shared internally on a need-to-know basis according to the sensitivity level. For the most sensitive grievances (Levels 4 and 5 detailed in section 7.3), information is restricted to the staff collecting the grievance, the Country MEAL Manager, the Gender & Safeguarding Specialist, country coordination and potentially Acted's TCI department; any further involvement of Acted staff must be authorised by country coordination. Confidentiality breaches are in violation of Acted's Code of Conduct, and will be investigated and responded to with disciplinary measures against staff, implementing partners, and contractors.

These processes are publicly advertised via community sensitisations throughout the project cycle, identifying the means for submitting grievances, setting out the length of time users can expect to wait for acknowledgment, response, and resolution of their grievances, descriptions of the transparency of the procedures, and the governing and decision-making structures. Visibility materials outlining the same processes will be made available in local languages wherever feasible, informed by community preferences stated in needs assessments.

7.3 Complaint classification

Acted classifies all feedback and complaints received through the AFM into five different categories with further sub-classifications. They are detailed below:

Table 5: Level 1 of AFM

Level 1 (Request for information)	
A solicitation to obtain clarification on a given topic. This includes questions formulated by any person or group or entity who cannot clearly identify Acted's mandate, future interventions planned, activity implementation timings, beneficiary selection process, etc.	
Information about the distribution	Place / date / time of distribution
	Asking about another distribution
	Asking about the distribution process / methodology
	Other
Information about the assessment	Place / date / time of assessment
	Asking about the assessment process / methodology
	Asking why they were not interviewed during the assessment
	Other



Information about beneficiary selection	Asking if they / their relatives are selected
	Asking why they were not selected / why they did not receive assistance
	Asking information about selection criteria
	Asking how to apply for assistance
	Asking why some people receive more or less assistance than others
	Other
Information about the assistance	Asking when they will receive assistance
	Specific question about the assistance received
	Asking if the assistance will be renewed (2nd round, 3rd round, etc.)
	Other
Information about the project	Area of the project / sector of intervention / activities
	Asking to renew / extend the project
	Asking about existing Acted projects
	Request / suggestion for another project
	Information request regarding future projects
	Other
Information about Acted recruitment process	Asking if Acted is hiring
	Asking about the hiring process
	Asking about the time of the interviews
	Other
Thanking note	
Other	

Table 6: Level 2 of AFM

Level 2 (Request for assistance)	
Asking Acted for help, in the form of money, resources, training, etc. Usually such requests are based on a description of the difficult situation faced by people, groups or entities.	
Request for assistance	Request for assistance / to be included in the beneficiary list / to include other people
	Request for more / further assistance
	Request to adapt the assistance
	Other
Request to change beneficiary data	Request to modify consent for data handling
	Other
Other	

Table 7: Level 3 of AFM

Level 3 (Minor complaint regarding the activities)	
Non-sensitive complaints on activities implemented by Acted, its implementing partners and contractors, that may have a negative impact on the outcome of the activity/project. They are related to - but not limited to - issues of entitlements and commitments not met, issues in project design, beneficiary identification, quality of the assistance or project delivery, i.e. poor organization of project sites such as overcrowding during a distribution, problems in the cash transfer process, etc.	
Alleged assessment problem	Census-related unintentional problems
	Other
Problem in project design	Lack of capacity / difficulty of the recipient to maintain provided items / infrastructure
	Provision of inappropriate / irrelevant assistance
	Negative environmental impact (not directly life threatening)
	Other
Difficulties in beneficiary identification	Problem with the beneficiary ID number / card / SIM / token
	Error in the identification information of a beneficiary
	Request for someone else to replace the beneficiary at the distribution / activity
	Other
Problem in project implementation	Delays in providing assistance
	Beneficiary has not received the assistance despite being selected
	Lack of information / communication on the activity
	Change of location of initially planned activities
	Difficulty of access to the activity
	Poor quality of services provided
	Difficulty of access to the AFM
	The distribution point is not set up properly
	Acted projects did not include all elements initially promised to community
	Other
Alleged logistic issue	Damaged items / infrastructure when received
	Missing items
	Poor quality of items / infrastructure
	Delays in receiving the assistance
	Problem with a service provided / supplier of Acted
	Problems in the cash transfer process
	Other
Absence during activity/assessment	Absence during assessment / verification / registration
	Absence during distribution
	Other



HR-related issues	Delays in the payment of incentives to daily workers contracted by Acted
	Problem with a daily / incentive worker contract
	Other
Other	

Table 8: Level 4 of AFM

Level 4 (Major complaint regarding the activities)	
Major complaints on activities implemented by Acted, its implementing partners and contractors that may have a negative impact on the outcome of the activity/project and affect beneficiaries' well-being, safety and security. They are related to - but not limited to - alleged irregular or biased beneficiary selection process, activities putting beneficiaries/community members at risk and misbehaviour (other than sexual exploitation and abuse, and other than child ill-treatment or negligence that should be classified as Level 5 complaints).	
Alleged irregular or biased selection process	Unfair exclusion
	Unfair inclusion
Activities putting beneficiaries/community members/environment at risk	Activity triggering tensions/threats within the community/between villages
	Problem with Acted assistance, leading to harming beneficiaries/community
	Major environmental impact
	Other
Alleged misbehaviour (other than sexual exploitation and abuse, and other than child ill-treatment or negligence)	Beneficiary/community member towards daily / incentive worker contracted by Acted
	Acted staff towards beneficiary/community member
	Authority/community representative linked to the project towards beneficiary/community member
	Other
Security-related issue	Dangerous animals
	Demonstrations around the intervention site
	Physical harm to beneficiaries
	Military presence around the intervention site
	Threats to Acted staff or premises
	Violence/armed conflict affecting beneficiaries around the intervention site
	Other
Post-distribution issue	Unofficial taxation
	Payment linked to rent or services
	Contribution to community fund or pooled cash system
	Sale of assistance received
	Other

Other	
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Table 9: Level 5 of AFM

Level 5 (Sensitive complaints)	
Corruption is a dishonest conduct that consists of seeking, soliciting, accepting or receiving – directly or indirectly – all unjustified payment, gift or benefit for having undertaken, or, alternatively, for having abstained from professional obligations.	
Alleged corruption/fraud	Product substitution : unmatching quality or quantity of aid
	Reception of a different kind of aid, poorer quality or fewer items than ordered and paid for (e.g. the delivery differs from what was ordered and paid, in either quantity or quality).
	Theft/extortion
	Theft: Act of taking a third party's property without its consent (example: kits stolen from the BNF after the distribution) Extortion: act of obtaining money or goods through coercion or force (example: half of cash allowance forcibly taken by an Acted staff member)
	Irregular/biased selection process
	Promise to be selected in exchange for money, goods or services (other than sexual - see below): beneficiaries were selected because they are linked to the government, a political party, the PM, or were asked for money to be added on the beneficiary lists, etc. Favoritism/conflict of interest (e.g. some people were selected/excluded because they are linked to the government, a political party, the PM, etc.)
	Falsification of data/documents/beneficiaries
	Change in data or documents in order to deceive, or creation of fake data, reports, invoices, beneficiaries, etc. (e.g. creation of ghost beneficiaries, beneficiary registration database, distribution lists, attendance sheets, payment sheet).
	Bid rigging
	Companies competing for work make a secret agreement, for example to increase their prices, to share the work, or to coordinate their bids on project contracts, in order that they both gain financially.
Other	
Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.	
Need for protection regarding abuse (if not Acted-related)	

Alleged sexual exploitation/abuse	If the complainant/survivor is reporting a GBV or SEAH complaint and is not an Acted beneficiary and if the alleged perpetrator is not Acted staff or Acted's partner/contractor staff.
	Sexual favours against aid/food/jobs/other
	Defined as the preferential treatment or promise of preferential treatment (including but not limited to aid, food, jobs) given in exchange for sexual favours from a person; It includes solicitation only, and explicit request for sexual intercourse in exchange for any preferential treatment or reward.
	Sexual assault
	Defined as any physical assault of a sexual nature committed against another person, by violence, coercion, threat or surprise - including, but not limited to, kissing or rape.
	Paid sexual relations
	Defined as the payment of a sum of money or obtention of a service (other than aid, food or job) in exchange for a sexual relationship, intercourse or sexual favours. Solicitation alone is also prohibited.
	Human trafficking of a sexual nature
	Or "procuring", is defined as the recruitment, transportation, transfer or concealment of persons by the provision of means, threat or any other form of coercion, fraud or abuse of power or by taking advantage of the sexual activity of a person.
	Sexual harassment
Characterized as unacceptable and unwelcome behaviours or practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating. While typically involving a pattern of conduct, sexual harassment may take the form of a single incident. Including but not limited to: - physical assaults of a sexual nature, or physical intent such as touching, pinching, fondling or any other gesture against the body of another individual; - sexual advances, sexual proposals or comments with sexual connotations such as equivocal gestures, noises, remarks, jokes or comments about a person's sexuality or sexual experiences; - intimidation, threats or barriers on someone's aspirations because of the gender of the person concerned; - reprisals in response to a sexual harassment complaint.	
Other	
Alleged child ill-treatment or negligence: All forms of physical and/or psychological abuse, sexual abuse, negligence or negligent treatment, or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. Any minor person (under the age of 18) is considered a child.	
Need for protection regarding abuse (if not Acted-related)	



Alleged child ill-treatment/negligence	If the complainant/victim is not an Acted beneficiary and if the alleged perpetrator is not Acted staff or Acted's partner/contractor staff.
	Abuse (physical, emotional maltreatment or negligent treatment)
	Physical abuse : Actual or potential physical harm as a result of an interaction or lack of interaction, that is reasonably within the power of a person in a position of responsibility, power or trust. This may be a single incident or repeated acts. Including, but not limited to, restriction of movement.
	Emotional maltreatment : acts that cause or are likely to cause harm to the child's mental, spiritual, moral or social health and development. It may include, but is not limited to, acts of denigration, use of child as a scapegoat or sufferer, threat, intimidation, discrimination, derision or any other form of hostile treatment or rejection.
	Negligence : The caretaker's inattention or failure to ensure the child's development in all areas, including health, education, emotional development, nutrition, shelter and safe living conditions, within the context of reasonably adequate resources. It is also about failing to provide the child with the necessary care and protection from harm to the extent possible.
	Sexual exploitation/abuse
	Sexual exploitation : The abuse of a position of vulnerability, differential power or trust for sexual purposes; this includes, inter alia, profiting financially, socially or politically from the exploitation of a child. Prostitution and child trafficking fall into this category. Sexual abuse : Any use of a child's body for sexual purposes for the pleasure of someone older than the child, regardless of the relationship between them, and even without coercion or violence. Not knowing the age of the person is not a valid defence.
	Child labor/commercial exploitation
	The use of a child for work or other activity in the interest of others. These activities are harmful to the child's physical and mental health, education and spiritual, moral or emotional social development (WHO, 1999). Including but not limited to:
	- Children's enlistment in the armed forces or armed groups - Child labour (full or part-time)
	Other

7.4 Communication and awareness raising of the AFM

Feedback and complaints can be escalated by beneficiaries and community members in project areas via established communication channels. The diversity of channels allows access to all beneficiaries irrespective of gender, disability, status (IDP, returnees), ensuring confidentiality. Chosen communication channels are informed by community preferences expressed in preliminary MEAL surveys. These include:

- Hotline



- In-person with Acted staff
- Complaint boxes

AFM procedures will be widely disseminated to all stakeholders involved in the project. The information will focus in particular on the following points: (i) what is Acted, and what are our organisational mandate, values and principles; (ii) information about the specific project implemented in the area; (iii) the behaviour to be expected from Acted staff, i.e. Acted Code of Conduct; (iv) the purpose of the AFM; (v) the nature of possible complaints; (v) who can lodge a complaint; (vi) where and how to complain; (vii) principles of non-retaliation and confidentiality; (viii) how Acted will manage and respond to complaints and feedback, including the timeframe in which to expect a response. The information will be disseminated at both household and community level to allow potential complainants to be familiar with AFM procedures to use them if necessary.

The dissemination of information will extend to the project's intervention areas and to both community members and beneficiaries. The AFM contact information will be displayed on visibility materials including banners during project activities (distribution, workshops, consultations, trainings, etc.), cards with hotline number given to community members at the beginning of the project and hotline number displays on all complaint boxes. These AFM visibility materials will take into account the local language and literacy levels of the targeted stakeholders to facilitate the perception of the information.

Specifically concerning sensitive complaints, visibility materials will detail unacceptable staff behaviour and contact information for the Transparency line, an anonymous alert platform overseen directly by Acted's Transparency, Compliance and Investigation (TCI) department.

7.6 AFM Complaint registration, follow-up and closure

All complaints and feedback received through Acted's formalised grievance redress mechanism – the Acted Feedback Mechanism (AFM) are formally recorded in Acted's global Complaint Follow-Up (COMPFU) online database. This is a centralised, secure platform that holds all feedback and complaints received by Acted across all missions and projects, enabling accountable oversight by Acted's HQ.

The complaints register contains at least the following elements:

- The complaint ID number
- The date the complaint was received
- The name of person who collected the complaint
- How the complaint was received
- Full name of complainant or "Anonymous"
- Gender of complainant
- Personal data use consent
- External referral consent
- Type of complainant
- Geographic area the complaint is made from
- Description of the complaint
- Relevance to Acted (Yes/No)
- Did the complaint contain a thanking note?
- Sensitivity level, sub-category and detail on the sub-category
- Does the complaint need to be referred externally?



Complaints will be recorded in a COMPFU template and transferred to the capital office for review before uploading onto the online COMPFU database. To ensure compliance with global Acted procedures, Level 4 and Level 5 complaints collected at the field level will be reviewed by the HQ Accountability Officer monthly.

All complaints should receive an initial acknowledgement of receipt within five working days. The transmission of the acknowledgment of receipt will use the same means of receiving the complaint, if another faster means of contact is not provided. Acknowledgments of receipt will be made for both Acted-related and not Acted-related complaints.

The follow-up pathway of feedback and complaints is determined by the sensitivity level and the relevance to Acted. Each pathway is detailed below:

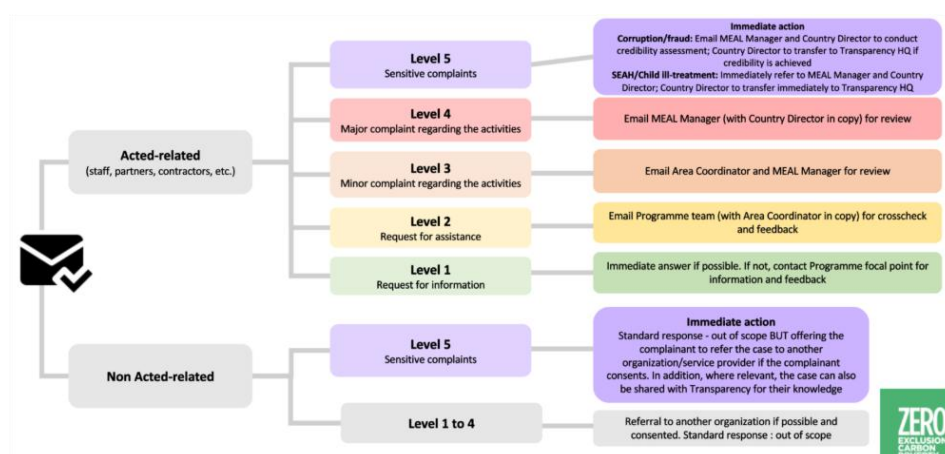


Figure 3: Pathway of feedback and complaints

All feedback and complaints must be resolved and closed ideally within 15 working days of initial receipt; this timeline may extend if the complaint requires formal investigation by the TCI department. Feedback and complaints are considered closed when a final notification has been issued to the complainant, detailing the resolution of the case. If a complainant cannot be recontacted after several attempts, the case can be closed by Acted without final notification. Anonymous complaints or cases without contact details are still followed internally.

All AFM cases, including follow-up and corrective actions, are subject to monthly global cross-checks to ensure appropriate processing, escalation, and closure of sensitive grievances, reinforcing organisational oversight and accountability.

7.7 Sensitive complaints

Given the particularly sensitive nature of Level 5 complaints, access to information relating to sensitive complaints will be limited to the staff collecting the complaint, the MEAL Manager, the Country Director, the HQ Accountability Officer and the TCI Department. To file a sensitive complaint, the complainant (or an intermediary) can use either the established AFM communication channels or directly contact the Transparency line run by Acted's TCI Department, via email or anonymous online platform.



The follow-up procedure for sensitive complaints depends on the sub-category. For Acted-related, Level 5 complaints relating to alleged corruption or fraud, the MEAL Manager and Country Director must conduct a credibility assessment to determine the legitimacy of the complaint. If the credibility threshold is achieved, then the Country Director will refer the complaint to the HQ TCI department for further investigation. For Acted-related, Level complaints relating to SEAH or child ill-treatment or negligence, no credibility assessment is conducted; the Country Director will refer the complaint directly to HQ TCI for investigation. Not Acted-related Level 5 complaints will be referred to a relevant actor with the consent of the complainant.

7.8 MEAL and Reporting

A quarterly report on the status of feedback and complaints will be produced and will be included in the project's periodic activity report. Descriptions of non-sensitive complaints according to their classification will be made in the quarterly reports and shared with the Programme team to feed into lessons learned. Acted will also continue to update its public Environmental and Social Risk-related complaints register on the "Accountability to Affected Populations" page on the Acted website each quarter.

Additionally, AAP questions will be included in MEAL surveys to assess the functioning of the AFM. The complainant's satisfaction with the handling of their complaint will be measured, as well as their awareness level on the AFM, in order to make the necessary corrections for the continuation of the project, if necessary.

8. Protection from sexual exploitation, abuse and harassment (PSEAH)

8.1 Overview and key principles

Acted applies a zero-tolerance approach to sexual exploitation, abuse and harassment (SEAH). The project enforces Acted's Code of Conduct, Policy on Protection from SEAH and Child Protection Policy, which are binding on all staff, implementing partners, suppliers and contractors. These are aligned with the Inter-Agency Standing Committee (IASC) Six Core Principles, UN Secretary-General Bulletins ST/SGB/2003/13 and ST/SGB/2019/8, and the CHS Alliance guidelines.

Implementation is guided by the following principles drawn from Acted's PSEAH Policy (2025):

- Neutrality and impartiality: safeguarding measures apply uniformly to all stakeholders.
- Confidentiality: information is shared strictly on a need-to-know basis.
- Managerial responsibility: each line manager is accountable for prevention, reporting and follow-up.
- Survivor-centred and do-no-harm approach: survivor safety, dignity and informed consent are prioritised.
- Accountability and non-retaliation: any report made in good faith is protected from reprisal.

These commitments are implemented through Acted's internal PSEAH Checklist and Safeguarding Action Plan, which provide verifiable standards across all missions.

8.2 Comprehensive mitigation measures

The project applies comprehensive mitigation measures to address SEAH risks across all operations. These measures are defined through Acted's PSEAH Checklist, which ensures



consistency in safeguarding implementation. The checklist covers forty-three standards organised under four operational pillars: Deterrence, Prevention, Identification and Response.

Under the deterrence pillar, recruitment integrates SEAH screening, including behavioural interviews, gender-balanced panels, reference checks and participation in the Misconduct Disclosure Scheme. All contracts include mandatory SEAH clauses, and confirmed breaches result in disciplinary action up to dismissal.

Prevention measures include mandatory induction and annual refresher training for all staff, daily workers and partners. E-learning modules and investigation workshops complement field sessions. Acted Syria also participates in the national PSEA Network and Protection Sector.

Identification mechanisms ensure visibility of acceptable conduct and complaint channels. Posters in Arabic display hotlines and reporting options. Community sensitisation sessions and gender-segregated focus groups provide safe spaces for disclosure. Response measures prioritise confidentiality, consent and timely survivor referral. Each allegation triggers a risk assessment and activation of immediate support, while all data are stored securely on password-protected systems with restricted access.

Based on Acted's internal PSEAH Checklist self-assessment, validated by country management and HQ oversight, Acted Syria reached an overall compliance rate of ninety-nine percent in 2025:

Pillar	Achievement 2025
Deterrence	100 percent
Prevention	98 percent
Identification	100 percent
Response	100 percent
Overall	99 percent

The 2025 results show that safeguarding standards are strongly embedded across all project bases.

8.3 Reporting protocols and complaints mechanisms

Acted applies an integrated, survivor-centred and gender-responsive grievance redress and feedback system, specifically adapted to SEAH reporting. This mechanism is embedded within Acted's broader Accountability to Affected Populations (AAP) framework and ensures accessible, confidential and ethical reporting across all project locations.

Acted considers that SEAH complaints should not be collected through a standalone mechanism, as duplicating systems can confuse affected communities and increase reporting barriers. Instead, SEAH alerts are channelled through existing accountability and feedback systems, with dedicated confidential routing to staff trained in handling SEAH-related complaints. The system combines:

- the Acted Feedback Mechanism (AFM) for community members and project participants; and
- the Transparency Line for staff, partners, contractors, and all third parties – which may also be used by community members and project participants who wish to report directly to Acted HQ.

Both mechanisms are inclusive, gender-responsive and accessible to women, men, girls, boys and persons with disabilities.



The AFM provides multiple safe entry points for SEAH-sensitive and other complaints, ensuring accessibility at community level. Entry points include:

- Complaint boxes installed in accessible community spaces.
- Accountability focal points and trained MEAL staff.
- Local contact numbers displayed in all offices.
- Community awareness sessions and AFM committee meetings.

Visibility and accessibility are reinforced through posters, banners, laminated cards and leaflets in English, and Arabic. All AFM complaints are categorised into five levels; Level 5 (sensitive complaints such as SEAH or Child Safeguarding) are immediately and confidentially redirected to the Acted's HQ Transparency, Compliance and Investigation (TCI) Unit for assessment and follow-up.

All complaints are acknowledged within five working days. Follow-up actions are initiated within fifteen days, depending on the severity and confidentiality requirements. This integrated system avoids duplication and confusion by using a single-entry point for all feedback while ensuring that SEAH alerts are automatically channelled to trained safeguarding staff.

The Transparency Line (for SEAH, child safeguarding, misconduct and fraud) is a secure and confidential whistleblowing platform managed by Acted's HQ TCI Unit. It can be accessed online at <https://transparency.acted.org> or by email at transparency@acted.org. Information on the Transparency Line is widely disseminated to ensure awareness and accessibility:

- Posters are displayed in all Acted offices, bases and guesthouses, showing the contact email address and online platform link. The mechanism is systematically presented during all PSEAH staff trainings, partner capacity-building sessions and supplier onboarding briefings. Laminated quick-reference cards listing the hotline and email contacts are distributed to Programme, MEAL and field staff.

Reports are acknowledged within five working days by the HQ TCI Unit, which conducts a preliminary assessment and coordinates follow-up in accordance with Acted's PSEAH procedures. All information is treated with the highest level of confidentiality and shared only on a need-to-know basis.

Visibility and awareness: Information about both the Transparency Line and the AFM, including contact details and confidentiality commitments, is permanently displayed in Acted's offices, bases and project sites, and presented systematically during staff inductions, community meetings and partner orientations to ensure awareness of safe reporting options.

Capacity and survivor-centred handling: Accountability staff, PSEAH focal points and programme teams are trained on safe disclosure reception, informed consent, confidentiality and the do-no-harm principle. Upon receiving or witnessing a SEAH-related concern, staff must immediately notify the Country Director or use the Transparency Line. Field staff also receive laminated "SEAH Reporting Cards" reminding them of this procedure and listing key contacts – the Country Director, the Transparency Line and the inter-agency hotline. Protection against retaliation for anyone reporting misconduct or cooperating with authorised investigations is ensured through Acted's internal whistle-blowing policy, in line with the UN Secretary-General Bulletin (2017) on protection against retaliation.

External reporting option (GCF IRM): In addition to Acted's internal and community mechanisms, stakeholders may submit SEAH-related or other complaints directly to the GCF Independent Redress Mechanism (IRM), which receives and addresses grievances related to GCF-financed projects. Complaints can be filed through the IRM's secure online form at



<https://irm.greenclimate.fund/case-register/file-complaint> or by email to irm@gcfund.org. Acted will ensure these IRM contacts are advertised on local communication materials (office/site posters, banners, laminated cards and community leaflets) alongside Acted and inter-agency hotlines.

8.4 Procedures for SEAH cases

Procedures for SEAH cases are defined in Acted's Policy on Protection from SEAH (2025) and Investigation Memo v2.0 (2023). They ensure that each case is managed through a structured, survivor-centred and transparent process consistent with humanitarian best practice.

Upon receipt of an alert through the Transparency Line (<https://transparency.acted.org>) or the Accountability and Feedback Mechanism (AFM), the Country Director and the HQ Transparency, Compliance and Investigation (TCI) Unit conduct an immediate risk assessment to determine protection needs and potential health or security risks. Medical, psychosocial or legal referrals are initiated based on the survivor's informed consent, and the case is formally coded and secured within Acted's encrypted database.

Investigations are led by the HQ TCI Unit in coordination with the Country Director and Safeguarding Coordinator. Evidence collection includes document review and structured interviews with reporters, survivors, witnesses and subjects of concern, using trauma-informed techniques. Investigators apply the balance of probabilities standard of proof, in line with international administrative investigation practice and all participants sign confidentiality agreements. Throughout the investigation, risk assessments are regularly updated, and protective measures, such as administrative leave or temporary relocation, may be applied. Findings are consolidated in a formal investigation report. Disciplinary decisions are made by HR management and the Country Director (for national staff) or HQ HR (for international staff). Donor notifications are handled by HQ in line with applicable contractual and regulatory requirements. . . All external communications are anonymised and validated by HQ. Lessons learnt feed directly into the mission's Safeguarding Action Plan to strengthen prevention and accountability. All investigation materials are stored electronically on encrypted servers with limited access. Personal identifiers related to SEAH cases are strictly segregated, access-restricted, and do not appear in external reports or non-authorized HR documentation. If an allegation involves a third party, referrals are made through the national PSEA Network or Protection Sector.

8.5 Survivor support modalities

The project's Executive Entities guarantees timely, appropriate and survivor-centred assistance for any person affected by sexual exploitation, abuse or harassment. Support is provided strictly on the basis of informed consent, with full respect for confidentiality and dignity. Survivors may withdraw or modify their consent at any time.

Referrals follow the Standard Operating Procedures for Medical and MHPSS Referrals (SEAH-05.1), including for gender-based violence (GBV), and use the Consent Form (SEAH-05.2.1) and Comprehensive Referral Form (SEAH-05.2.2) to ensure safe data handling. All forms are stored securely and shared only with authorised service providers. Survivors are informed of available options and can choose whether to engage with any or all of the services listed below.



Type of support	Modalities and partners
Medical care	Survivors have immediate access to healthcare facilities capable of providing Clinical Management of Rape (CMR) GBV, and post-exposure prophylaxis. Medical services are available through the Ministry of Public Health, UNFPA-supported clinics and NGO medical partners. Survivors are accompanied to health facilities when needed to reduce safety or transport barriers. Costs of treatment are fully covered through Acted's emergency support procedures.
Psychosocial and MHPSS support	Psychological First Aid (PFA) is provided immediately after disclosure by trained safeguarding staff. Survivors are then referred to specialised mental health and psychosocial support (MHPSS) actors identified in the national GBV service-mapping. When in-person counselling is not feasible, confidential remote sessions are arranged. Psychosocial support aims to stabilise the survivor, reduce trauma symptoms and promote recovery at their own pace.
Legal assistance	Survivors are informed of their right to pursue justice and offered a referral to specialised legal aid actors identified in the national GBV service-mapping. All legal procedures proceed only with the survivor's explicit consent and Acted may facilitate transportation or accompaniment where needed.
Community-based protection	Acted engages local protection committees, traditional and religious leaders, and women's groups to create safe spaces and prevent retaliation. Where security risks are identified, the Gender and Safeguarding Specialist may request temporary relocation, safety escorts or confidential changes in work assignment. Community awareness sessions also emphasise confidentiality and non-stigmatisation of survivors.

Follow-up occurs within seventy-two hours of referral to confirm safe access and identify additional needs. The Gender and Safeguarding Specialist maintains a confidential log of referrals and outcomes, reviewed quarterly to enhance response quality. The mission's SGBV Service Mapping (SEAH-05.3) is updated annually to ensure availability of qualified medical, psychosocial, legal and protection providers across all regions.

8.6 Oversight, monitoring and continuous improvement

The Country Director ensures overall compliance with Acted's PSEAH Policy, supervises reporting, coordinates donor notifications, oversees focal points, ensures training coverage and updates the PSEAH risk matrix. At headquarters level, the Transparency, Compliance and Investigation (TCI) Unit manages investigations, validates findings and consolidates global learning across missions. Monitoring framework for preventive and mitigative SEAH measures: Acted Syria maintains a structured monitoring framework to ensure that preventive and mitigative SEAH measures are effectively implemented and continuously improved under the supervision of the Country Director and with technical support from the Gender and Safeguarding Specialist and HQ TCI Unit. At field level, Gender and Safeguarding Specialist serves as a PSEAH focal point in the project area and will monitor preventive actions, awareness sessions and grievance channels, and report monthly to the Country Director for trend analysis and risk identification.



PSEAH focal points do not conduct investigations and systematically refer all allegations to the HQ TCI Unit, in line with Acted procedures

The Specialist maintains a country SEAH risk register, updated regularly to reflect contextual and programmatic risks. This register feeds into the annual PSEAH Action Plan, jointly developed with the Country Director. The plan translates Acted's four operational pillars, deterrence, prevention, identification and response, into concrete, measurable actions. For each activity, it specifies the process, expected result, performance indicator, responsible person, deadline and implementation status.

The Action Plan is a digital, living tool, updated in real time by focal points and accessible to management and HQ. This ensures ownership, accountability and transparency in progress tracking. Monitoring combines quantitative indicators and qualitative assessments to evaluate implementation and effectiveness.

Key indicators include:

- implementation rate of the PSEAH checklist per pillar (target at least eighty-five percent);
- percentage of project staff and partners trained on PSEAH (target one hundred percent);
- percentage of Acted field bases with functional and accessible grievance mechanisms (AFM and Transparency Line) (target one hundred percent of operational bases);
- percentage of survivors, where safely and ethically feasible, expressing satisfaction with referral services through anonymised and voluntary feedback mechanisms (target at least seventy percent); and
- number of SEAH-sensitive complaints received, investigated and closed.

Progress against these indicators is reviewed quarterly at mission level by the Gender and Safeguarding Specialist under the supervision of the Country Director and annually by the HQ TCI Unit as part of Acted's global safeguarding reporting. At national level, Acted Syria contributes to the inter-agency PSEA Network, under the leadership of the Humanitarian/Resident Coordinator, sharing progress, good practices and lessons learnt to strengthen collective accountability.

This integrated monitoring and governance framework ensures continuous oversight, timely adaptation of mitigation measures and evidence-based learning, embedding safeguarding commitments across all phases of programme design, implementation and review in line with Acted's PSEAH Policy, GCF ESAP standards, and Syrian law.