Gender Assessment

FP315: Livable and Resilient Cities Project (LRCP)

Bhutan | World Bank | GCF/B.46/02/Add.08

5 October 2026

GREEN CLIMATE FUND

ANNEX 8
Gender Assessment & Action Plan

TABLE OF CONTENTS

1 Gender Assessment: Introduction 1

1.1 Project Overview 1

1.2 National and Institutional Frameworks and Legislations Supporting Gender Equality 1

2. Gender Analysis And Key Gender Gaps In The LRCP 3

2.1. Limited Representation Of Women In Decision-Making Roles Across DHS - Moit, TT And CBS. 3

2.2. Women Entrepreneur's Income Will Be Affected Due To The Redevelopment Works In Norzin Lam 4

2.3. Women And Persons With Disabilities Reported Safety And Accessibility Issues With Bus Services And Related Infrastructure. 5

2.4. Gendered impacts of Water Shortages and Disasters: Targeted WASH interventions for Women 5

3. Gender Action Plan 7

3.1. Gender Action Plan 7

4 Sexual Exploitation and Abuse/Sexual Harassment Risk Management: Introduction 16

4.1 Project Overview and SEA/SH Risks 16

5 Violence against Women and Children 18

5.1 Violence against Women 18

5.2 5.2 Violence against Children 19

6 Legislatioon, Advocacy, and Support Services 20

6.1 Legislation 20

6.2 Support Service Access 21

7 SEA/SH Prevention and Response Action Plan 24

7.1 Objectives of the SEA/SH Action Plan ..... **Error! Bookmark not defined.**

7.2 7.2 SEA/SH Prevention and Response Action Plan ..... **Error! Bookmark not defined.**

8 References 1

LIST OF TABLES

Table 1 Gender Action Plan 8

Table 2: GBV/SEA/SH Service Providers 21

Table 3: SEA/SH Prevention and Response Action Plan, LRCP 33

Acronym

ABS	Ability Bhutan society
ACREWAS	Advancing Climate Resilience of the Water Sector
BAOWE	Bhutan Association of Women Entrepreneurs
BGTP	Bhutan Green Transport Project
CBS	City Bus Services
CoC	Code of Conduct
CSI	Cottage and Small-Scale Industries
CSO	Civil Society Organization
DHS	Department of Human Settlement
DPoB	Disabled People's Organization of Bhutan
DV	Domestic Violence
FGD	Focus Group Discussion
GAP	Gender Action Plan
GBV/SEA/SH	Gender Based Violence Sexual Exploitation Abuse Sexual Harassment
GFP	Gender Focal Person
GPN	Good Practie Note
GRM	Grievance Redress Mechanism
IEC	Information Education and Communication
ITS	Intelligent Transportation Systems
JDWNRH	Jigme Dorji Wangchuk National Referral Hospital
LG	Local Government
LRCP	Livable and Resilient Cities Project
M&E	Monitoring & Evaluation
MIS	Management Information Systems
MoIT	Ministry of Infrastructure and Transport
NCWC	National Commission for Women and Children
PIU	Project Implementation Unit
PMU	Project Management Unit
PPD	Planning & Policy Division
PSA	Public Service Agreement
PWDs	People with disabilities
RBP	Royal Bhutan Police
RENEW	Respect Educate Nurture and Empower Women
SEP	Stakeholder Engagement Plan
SoE	State-Owned Enterprise
SRHR	Sexual Reproductive Health and Rights
SSPD	Spatial and Strategic Planning Division
TT	Thimphu Thromde
TTI	Technical Training Institute
ToT	Training of Trainer

1 Gender Assessment: Introduction

Note: The Gender Assessment, Gender Action Plan (GAP), and the SEA/SH Prevention and Response Action Plan are based on the findings of this assessment and consultations, including discussions led by the Department of Human Settlement (DHS). These are living documents and will be refined and adapted in response to changing contexts during implementation. Final endorsement by the client will be required to support effective implementation.

1.1 Project Overview

The Livable and Resilient Cities Project (hereafter "LRCP" or "The Project") aims to enhance livability and climate resilience in Thimphu Thromde, through improved targeted urban infrastructure and service delivery. This project will result in reduction of non-revenue water, improved user satisfaction with public spaces, reduce and avoid GHG emissions through promotion of public transport and promote institutional reforms and improved operational systems by Thimphu Thromde to deliver climate-resilient urban services. The LRCP builds on the Bhutan Green Transport Project (BGTP) and the Thimphu Structure Plan 2023-2047. The PMU for the project is Department of Human Settlements (DHS), Ministry of Infrastructure and Transport (MoIT). While Thimphu Thromde is the PIU and is prepared under the World Bank's Environment and Social Framework (ESF) for co-financing through the Green Climate Fund.

The project places strong emphasis on gender equality as a central element of its design and implementation. Both the World Bank and GCF recognize that advancing gender equity is not only a matter of rights but also a driver of effectiveness, inclusiveness, and long-term success in climate action. The World Bank integrates gender analysis across its policies and operations—using tools such as the Poverty and Social Impact Analysis (PSIA) and Country Partnership Frameworks (CPFs)—to ensure that climate initiatives address the differentiated needs and contributions of women and men. Similarly, the GCF applies a robust gender policy and action plan to guarantee inclusive participation and gender-responsive approaches in all adaptation and mitigation measures. Within the LRCP, the preparation of ESF instruments is a mandatory requirement, and the Gender Action Plan (GAP), together with the SEA/SH Prevention and Response Action Plan, serve as essential mechanisms to promote social inclusion, protect community rights, and ensure equity. These tools collectively strengthen the project's environmental, social, and economic sustainability.

1.2 National and Institutional Frameworks and Legislations Supporting Gender Equality

The Royal Government of Bhutan has adopted several national laws, policies and frameworks that are relevant from a gender perspective.

National Laws & Policies

The Royal Government of Bhutan has developed a comprehensive framework of laws and policies that support gender equality. The Constitution of Bhutan (2008) provides the overarching guarantee of rights and freedoms, while obligating the State to eliminate all forms of discrimination and exploitation against women. Building on this foundation, the National Gender Equality Policy (2020) sets out a framework to achieve substantive equality across political, social, and economic domains. It is currently being revised to include LGBTQI+ rights and emphasizes mainstreaming gender in climate change and disaster initiatives. The Domestic Violence Prevention Act (2013) protects individuals, especially women and children, from abuse in domestic settings, while the Disaster Management Act (2013) ensures gender perspectives are incorporated through community participation and representation. The National Youth Policy (2011) integrates gender issues by promoting equal access to education, training, employment, and entrepreneurship opportunities for young people while the National Policy for Persons with Disabilities (2019) guarantees equal rights and opportunities for vulnerable and marginalized groups, aiming to improve their quality of life. Finally, the 13th Five Year Plan (2024–2029) underscores Bhutan's commitment to gender inclusion by promoting equal participation of women and men in national development and strengthening institutions to deliver effective, gender-responsive programs. Together, these laws and policies

ensure protection from discrimination and violence, promote participation and inclusion, and mainstream gender across national development priorities.

Institutional Framework related to Gender Equality uin Bhutan

The Royal Government of Bhutan (RGoB) has advanced gender equality through strong legal and policy measures, consistent integration of gender issues into national planning since the 10th Five Year Plan, and alignment with international conventions. The establishment of the National Commission for Women and Children (NCWC) in 2004 was a milestone, serving as the lead agency for gender mainstreaming and rights of women and children. Elevated to autonomous status in 2008, the NCWC developed the National Plan of Action for Gender (2010) to strengthen capacity building, sex-disaggregated data, and gender-responsive monitoring. However, with the Civil Service Reform Act (2022), the NCWC lost its autonomy and was restructured under the Ministry of Education and Skills Development, potentially limiting its independence and influence.

To support mainstreaming, Gender and Child Focal Points (GCFPs) were introduced across ministries, dzongkhags, CSOs, and the private sector, but their effectiveness has been constrained by high staff turnover, limited authority due to junior positions, and inadequate funding for capacity building. The Gender Expert Group (GEG), comprising experts from government, CSOs, and private sectors, provides technical guidance, reviews policies, and supports training, while decentralization efforts since 2013 have sought to strengthen gender integration at local levels, though further capacity building and awareness are needed.

Civil Society Organizations, notably RENEW, play a critical role in women's empowerment, leadership advocacy, and preventing gender-based violence, while international partners such as the ADB, World Bank, and UNDP provide essential technical and financial support. To sum up, Bhutan's gender institutional framework reflects significant progress with clear structures and partnerships, though challenges remain around institutional independence, focal point effectiveness, and local-level capacity.

2. Gender Analysis And Key Gender Gaps In The LRCP

2.1. Limited Representation Of Women In Decision-Making Roles Across DHS - Moit, TT And CBS.

The Department of Human Settlement (DHS) under the Ministry of Infrastructure and Transport (MoIT) will house the Project Management Unit (PMU) for the LRCP. Among its 73 staff, women represent only 29% (21 out of 73), and very few occupy senior or decision-making roles, reflecting broader gender underrepresentation in leadership. The Thimphu Thromde (TT) will serve as the Project Implementation Unit (PIU), responsible for urban infrastructure and water investments. While its overall workforce is nearly gender-balanced, 268 women out of 538 staff (49.8%) - women remain concentrated in labor and support roles (208 of 268 female staff). Only 55 women serve in regular professional or administrative positions, with very limited representation in leadership. Fewer than 10% of women occupy decision-making posts such as division heads or section chiefs. Representation in critical departments like Urban Planning, Finance, and Education is minimal (1–2 women in regular roles). This imbalance underscores weak institutional gender capacity and the need for structured measures to expand women's leadership pathways. In addition, many TT staff lack formal training in gender mainstreaming, social inclusion, and GBV/SEA/SH response. To strengthen gender equity, there is a need for awareness programs, leadership development workshops, and training on reporting and survivor-support mechanisms. This reflects wider national patterns, where women form 49.5% of the population but only 38% of the civil service, with even fewer in senior grades.

The City Bus Service (CBS) is tasked with implementing Intelligent Transport Systems (ITS) and Management Information Systems (MIS), managing electric buses, terminals, depots, and bus stops. While MoIT will procure buses, specialists, and equipment, CBS will focus on daily operations. The LRCP will also support CBS in becoming a financially independent State-Owned Enterprise through a sustainable business model and accountability mechanisms under a Public Service Agreement. CBS employs 95 staff, with women comprising 20 (21%). Of 61 bus drivers, only 7 are female, and of 34 office staff, 13 are women. Just 2 women hold leadership posts (HR/Admin Officer and Supervisor), meaning only about 10% of women are in decision-making roles. This mirrors broader national trends where women make up 44% of the workforce but only 38% of government employees, with senior positions largely male-dominated. Labour Force Survey data (Q4, 2024) further highlights gender disparities: women's unemployment (4.37%) is nearly double men's (2.27%), female urban labour participation in Thimphu is low (31.9%), and youth unemployment among women (21.2%) far exceeds that of men (14.5%). Women also earn significantly less than men (Nu 20,480 vs Nu 27,350 monthly).

A capacity assessment of women staff in DHS, TT, and CBS shows systemic barriers rooted in gender stereotypes that position men as suited for technical and leadership roles, while women are perceived as caregivers or suited for lighter works. Women face limited access to technical training, lack of confidence, underrepresentation in leadership, and challenges balancing family and professional responsibilities. Existing workplace supports (maternity leave, flexible arrangements, childcare services) are valuable but insufficient. Improvements needed include extending paternity leave, providing gender-responsive infrastructure (toilets, crèches), enhancing awareness on gender sensitivity, GBV/SEA/SH safeguards, and introducing mentorship, leadership training, and more family-friendly policies.

Female underrepresentation at specialist and managerial levels restricts the integration of gender perspectives in decision-making, recruitment, and policy development. Within DHS, institutional gender capacity is also weak. The Ministry's Gender Focal Point (GFP), appointed under NCWC, has limited influence due to competing duties in the Planning & Policy Division, with some staff unaware of her role. To address this, the LRCP will strengthen gender capacity by designating a dedicated GFP in the PMU and recruiting an external Gender Expert during implementation. This will ensure effective mainstreaming of gender and SEA/SH response throughout the project.

To sum up, while in LRCP's key institutions - DHS, TT, and CBS, women are well represented numerically but remain significantly underrepresented in leadership and technical roles. Their advancement is constrained by

persistent gender stereotypes, unequal access to opportunities, and limited institutional capacity. To ensure gender-sensitive urban governance and effective implementation of the Gender Action Plan, there is a clear need to strengthen workplace policies, create leadership pathways, provide targeted training and mentorship, and engage dedicated gender expertise.

2.2. Women Entrepreneur's Income Will Be Affected Due To The Redevelopment Works In Norzin Lam

Women entrepreneurs in Norzin Lam, Thimphu play a vital role in the local economy, but most operate at the lower end of the entrepreneurial pyramid in micro and small enterprises. While women own a higher share of Cottage and Small-Scale Industries (CSIs), they often have lower education levels, limited financial literacy, and face major barriers to accessing capital due to lack of collateral, low risk appetite, and confidence gaps. Many businesses remain small or informal, financed through savings, profits, or borrowings from family and friends, with very few accessing institutional loans despite banks' gender-neutral lending policies.

During the construction phase, women-owned businesses in Norzin Lam will face direct impacts including temporary displacement or relocation of business premises during construction; reduced foot traffic and customer access due to road closures, diversions, and construction barriers; noise, dust, and visual obstruction degrading the business environment and customer experience; potential income loss during peak construction periods, affecting their ability to meet financial obligations; and disruption to supply chains and logistics for inventory and service delivery. Beyond immediate disruption, women entrepreneurs expressed concerns about post-construction changes, including fear of increased rental costs following area upgrading, potentially pricing them out competition from larger, more capitalized businesses attracted to the improved commercial corridor; lack of information about construction timelines, mitigation measures, and compensation mechanisms; and limited participation in planning and decision-making processes affecting their livelihoods.

Barriers to resilence and recovery for women entrepreneurs

Women entrepreneurs in Norzin Lam face compounded vulnerabilities that limit their ability to absorb construction-related shocks and recover post-project. These barriers include:

- Limited access to business and financial management training, sector-specific technical assistance, mentorship, and networking.
- Discrimination and gender stereotypes that restrict women's opportunities and access to resources
- Greater household and childcare responsibilities that constrain time for business operation
- A "crisis of confidence" in engaging with financial institutions.
- Limited awareness of opportunities through CSOs and support networks.
- Low savings and working capital buffers, making them highly vulnerable to income disruptions.

Despite these challenges, women expressed strong demand for training in basic business management, financial management, ICT, digital marketing, branding and leadership. They are often more engaged and confident in women-only spaces, highlighting the importance of tailored mentorship and peer networks.

To address these gender-specific vulnerabilities and ensure women entrepreneurs benefit equitably from the Norzin Lam redevelopment, the project will introduce a comprehensive set of targeted interventions. These include capacity-building through business management and financial literacy training, alongside digital skills development to strengthen resilience and market access. The plan also aims to promote mentorship and peer networking by linking women entrepreneurs with established business leaders and support organizations. During construction, the project will provide livelihood restoration measures like timely communication, improved customer access, temporary vending options, and connections to financial support mechanisms. Post-construction, the plan prioritizes women's access to upgraded spaces, promotes their businesses, and supports their participation in business and municipal platforms. Throughout, gender-responsive stakeholder engagement ensures women's voices are actively incorporated into project planning, implementation, and monitoring.

Further, Civil Society Organizations (CSOs) like RENEW and others can play a crucial role by providing access to finance, training, mentorship, and networking, thereby helping women overcome systemic barriers, strengthen skills, and expand their enterprises. Supporting women entrepreneurs through targeted, project-responsive intervnetions not only enhances their confidence and opportunities but also contributes significantly to Bhutan's inclusive economic growth and does not inadvertently deepen gender inequalities.

2.3. Women And Persons with Disabilities Reported Safety and Accessibility Issues with Bus Services and Related Infrastructure.

The 2023 Bhutan Green Transport Project (BGTP) survey revealed significant gender and disability related challenges in public transport. Risks of harassment are highest for younger women and students. Overcrowding, poor lighting, inadequate drive accountability mechanisms, and absence formal reporting pathways compound safety and security risks. Women users, particularly married women with young children or lower levels of education, often find city buses uncomfortable due to overcrowding, limited storage space for belongings, and inadequately prioritized seating, leading many to prefer taxis or private vehicles for convenience. Safety concerns remain a key issue: 44% of women feel that public transport requires better security, younger women often avoid buses due to perceived risks of harassment, and many lack awareness of reporting mechanisms for incidents. Suggested improvements include CCTV cameras at bus stops and on buses, more reliable schedules, better route connectivity, and gender-sensitization training for bus drivers and staff.

Women aspiring to work in the transport sector such as drivers, maintenance workers, IT officers, and customer service staff face societal biases that view transport as a male-dominated sector. Female staff also report challenges in balancing professional responsibilities with childcare and eldercare, highlighting the need for safe, supportive, and family-friendly workplaces to enable long-term career participation.

Persons with disabilities (PWDs) encounter further barriers. Individuals with visual impairments need braille signage, tactile markers, and audio announcements for routes and stops, while those with mobility impairments struggle with high bus steps, poorly positioned seats and seat belts, and inconveniently placed grab bars. Female PWDs experience higher levels of discrimination and receive less assistance than male PWDs (33% vs. 55%). Addressing these challenges through gender-responsive and disability-inclusive planning, design, and operations is essential. Improving accessibility, safety, and support for women and PWDs will enhance mobility, foster confidence in public transport, and empower these groups to participate more fully in social, economic, and political life.

2.4. Gendered impacts of Water Shortages and Disasters: Targeted WASH interventions for Women

Women and girls are disproportionately affected by water shortages and disasters such as flash floods, as they bear primary caregiving responsibilities and rely on disrupted water, sanitation, and hygiene (WASH) systems. Their roles as primary household water managers mean that supply disruptions — whether from infrastructure stress, drought, or flooding — translate directly into additional time burdens, health risks (including menstrual hygiene management), and business disruptions for those operating in food, hospitality, and similar services. The LRCP water/WASH component focuses primarily on supply-side resilience and service management. However, the gender dimensions of this component extend beyond hygiene awareness and include: (i) the reliability of supply for female-headed households and women-owned businesses; (ii) communication and access arrangements during planned or emergency shutdowns; and (iii) equitable access to real-time information during water- and flood-related emergencies.

Drawing from the World Bank Entry Points for Integrating Gender in Resilient Infrastructure: Water Systems (2025), women and persons with disabilities are disproportionately impacted by water service disruptions and are often the last to receive emergency information. Gender-inclusive water service management should actively position women and vulnerable groups as direct beneficiaries of improved service reliability, not only as recipients of hygiene awareness campaigns.

Floods damage infrastructure like footbridges and roads, hindering women's mobility and access to health services, while also increasing risks of gender-based violence and limiting participation in disaster preparedness. Domestic water duties and menstrual hygiene management further heighten women's vulnerability during such disruptions.

Water shortages in both urban and rural areas create gender-differentiated impacts that the LRCP interventions aim to address:

- Time burden and opportunity costs: Women and girls spend additional hours fetching water from alternative sources, reducing time for education, income-generating activities, and rest.
- Health and hygiene challenges: Inadequate water supply compromises menstrual hygiene management (MHM), forcing women and girls to use unsafe practices including those in pregnancy, and postpartum care.
- Increased unpaid care work: Women shoulder responsibility for rationing limited water supplies, managing household hygiene with insufficient water, and caring for family members affected by waterborne diseases.
- Economic impacts: Women entrepreneurs (especially in food services, hospitality, and cottage industries) face business disruptions when water supply is unreliable. Street vendors and small restaurant owners in areas like Norzin Lam depend on consistent water access for operations.

LRCP water supply interventions, guided by environmental and social instruments, aim to build climate resilience and integrate gender-responsive planning. Projects like UNDP's ACREWAS target nearly 19,400 people, about half women, improving domestic water access and bridging knowledge gaps in urban disaster-risk water systems. Gender considerations in WASH infrastructure, early warning systems, and grievance mechanisms are essential to address women's disproportionate burden. Beyond infrastructure repair, long-term gender-responsive strategies can transform WASH systems into pathways for gender equality, by reducing unpaid care work, enhancing health, and creating economic and leadership opportunities for women. Promoting women's participation in disaster governance, education, and vocational training strengthens resilience and ensures inclusive, sustainable urban development in Thimphu.

4 Sexual Exploitation and Abuse/Sexual Harassment Risk Management: Introduction

4.1 PROJECT OVERVIEW AND SEA/SH RISKS

As per the World Bank's Environmental and Social Framework and screening tool, the project has been rated as having a "moderate" risk for Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH). Nationally, 33% of women in Bhutan aged 15-64 have experienced some form of physical, sexual, or emotional violence in their lifetime (NCWC, 2022). Despite this prevalence, only 4% of survivors seek help from formal institutions, largely due to stigma, fear of retaliation, and limited trust in law enforcement and justice mechanisms (NCWC, 2022).

Moreover, the transport and construction sectors in Bhutan have been flagged as high-risk environments for Sexual Harassment (SH), with a 2023 NCWC study reporting that 28% of female respondents in these sectors experienced some form of harassment at the workplace. Many incidents go unreported due to power imbalances, fear of job loss, and inadequate grievance redressal systems. In the project context, civil works particularly during the construction phase may amplify GBV/SEA/SH risks due to increased interaction between the incoming labor force and local communities, especially women, adolescent girls, and persons with disabilities.

The SEA/SH assessment identified the following key concerns:

- Labor Influx: The project will engage skilled and potentially expatriate laborers, necessitating the construction of temporary labor camps near residential zones, schools, and community centers regularly accessed by women and children. The proximity raises risks of sexual harassment, transactional or exploitative relationships (including with minors), and early or forced marriages, which in economically vulnerable communities may be misconstrued as opportunities for social and financial security.

- Health and Social Impacts: The influx and settlement of mobile laborers may lead to a heightened risk of sexually transmitted infections (STIs), including HIV/AIDS. Also, social tensions may arise between local residents and migrant workers due to cultural differences, perceived inequalities, or inappropriate conduct of workers. Additionally, there has been an increase in the number of sex workers in Thimphu despite the illegality of sex work in Bhutan. The reason for this increase is primarily due to the economic impact of the pandemic, which has left many people without livelihoods and access to employment opportunities. This issue also raises concerns about laborers interacting with sex workers and then returning to their work place, potentially increasing health and safety risks.

- Sustained Impact: These risks are likely to persist beyond the construction period, emphasizing the need for ongoing community engagement, monitoring, and established response mechanisms throughout the project lifecycle and into post-construction operations.

5 Violence against Women and Children

5.1 VIOLENCE AGAINST WOMEN

Intimate partner violence (IPV) remains one of the most common forms of violence against women worldwide. According to the National Study on Women's Health and Domestic Violence, approximately one in three women (33%) aged 15 - 64 has experienced some form of IPV - be it physical, sexual, emotional, or economic, at least once in her lifetime. Specifically, 24% reported emotional violence, 12% physical violence, and 5% sexual violence. Although Bhutan's reported IPV prevalence of 27% (World Bank Gender Data Portal) is slightly below the global average, it still indicates deep rooted gender based issues that require urgent attention (World Bank, 2023; NCWC, 2018).

Between 2018 and 2023, the Royal Bhutan Police (RBP) recorded nearly 2,500 domestic violence cases. However, these figures likely underestimate the actual intensity of the problem. Survivors often do not report abuse due to societal stigma, fear of retaliation, or normalization of violence within relationships. Data from the 2025 UNDP-NCWC Gender-Based Violence Elimination Strategy shows that 72.5% of women who experienced physical or sexual violence did not seek help from formal institutions, and only 11% reported incidents to the police. Factors such as economic dependency, social pressures, and lack of awareness continue to impede reporting (UNDP & NCWC, 2025).

The COVID-19 pandemic further exacerbated the situation. Lockdown measures and economic hardship led to a noticeable surge in domestic violence cases across Bhutan. The National Commission for Women and Children (NCWC) reported 900 domestic violence cases between 2016 and 2021, with a sharp rise during the lockdown periods. Likewise, RENEW, a leading civil society organization supporting survivors of gender-based violence (GBV), documented a 36.6% increase in GBV cases during the pandemic. While the number of reported domestic violence cases dropped to around 555 in 2022 (from over 700 in 2021), this decline is believed to be influenced by reduced restrictions and improved community outreach (NCWC, 2021; BBS, 2023).

A broader gender-based violence (GBV) context shows even more concerning patterns. A 2017 national survey found that nearly 40% of women had experienced IPV, with 15.8% reporting emotional abuse, and 35% noting controlling behavior by their partners. Alarmingly, severe physical violence—such as being hit, kicked, or threatened with weapons—was reported in nearly three-quarters of physical IPV cases. The intergenerational impact is equally worrying, with over 60% of children in violent households witnessing abuse, increasing their risk of psychological trauma and future behavioral issues (Bhutan Today, 2024; UNICEF, 2025).

Despite growing awareness and improved legal frameworks, the fight against IPV and GBV in Bhutan is far from over. Organizations such as RENEW and NCWC continue to play a vital role through shelters, counselling, legal aid, and advocacy programs. However, sustained efforts are needed to dismantle deeply rooted gender norms, ensure survivor-centric justice systems, and build resilient communities through education and empowerment.

Between 2020 and 2024, Bhutan's Royal Police recorded 1,527 domestic violence cases linked to alcohol consumption. The number of cases reported annually increased from 182 in 2020 to a peak of 407 in 2022, followed by slight decreases in 2023 (325 cases) and 2024 (316 cases). Alcohol remains a major factor driving domestic violence in the country (Royal Bhutan Police, 2025; Business Bhutan, 2024). RENEW documented 2,536 cases of abuse between 2020 and 2024, covering physical, emotional, economic, and sexual violence. A significant portion of these cases involved perpetrators under the influence of alcohol, illustrating the strong correlation between alcohol misuse and gender-based violence (RENEW, 2025; Asian News Network, 2025). High alcohol consumption

intensifies aggressive behavior and increases the risk of domestic violence, sexual exploitation, and harassment. Households with prevalent alcohol dependency show greater vulnerability to gender-based violence, emphasizing the need for comprehensive community and policy interventions (Business Bhutan, 2024).

Vulnerable groups, especially young girls and women, are disproportionately impacted by child marriage and human trafficking. Although child marriage is legally prohibited in Bhutan, there are cases that it exists in certain regions. Factors such as poverty, low education levels, and traditional practices contribute to this issue. Bhutanese individuals, especially women and children, remain vulnerable to human trafficking. In 2024, 38 suspected trafficking victims were repatriated from a range of overseas destinations . The Government has strengthened efforts by amending the Penal Code in 2021 and acceding to the UN Convention Against Transnational Organized Crime in 2023.

Limited employment options and rural to urban migration have contributed to an increase in sex work, frequently under exploitative or coercive circumstances. Economic hardships, particularly among young women, often drive involvement in transactional sex, highlighting the critical need for expanded economic empowerment and job creation programs for vulnerable populations (RENEW, 2023; UNICEF Bhutan, 2022).

5.2 5.2 VIOLENCE AGAINST CHILDREN

A 2016 NCWC study reported that 64% of children aged 13 - 17 in Bhutan experienced at least one incident of physical violence in their lifetime (NCWC, 2016). About 44.8% faced such violence before adolescence. Recent findings (2022–2023) indicate that physical violence against children remains widespread, with nearly 60% of children still facing abuse (NCWC & UNICEF, 2022). Among children who reported physical violence: 67.3% experienced abuse in school settings, indicating the need for better protection in educational institutions; 43.6% suffered violence at home, mostly by parents, relatives, or siblings.

Sexual violence remains a concern. In 2016, 12.8% of children reported experiencing at least one incident, with slightly more girls (13.5%) than boys (11.9%) affected (NCWC, 2016). Recent reports confirm that about 12% of children continue to face sexual or online abuse, underscoring the need for stronger child protection and awareness campaigns (Druk Journal, 2021; NCWC & UNICEF, 2022).

6 Legislatioon, Advocacy, and Support Services

6.1 LEGISLATION

Preventing violence against women and children is a national priority in Bhutan, reflected in legal frameworks such as:

Domestic Violence Prevention Act (2013)

It was enacted in Bhutan to address and prevent all forms of domestic violence, with a strong emphasis on protecting women and children. The Act reflects Bhutan's national commitment to ensuring safety, dignity, and equal rights, and identifies the prevention of violence against women and children as a national priority. The DVPA 2013 affirms that safeguarding women and children from violence is central to Bhutan's pursuit of gender equality, human rights, and national well-being.

Child Care and Protection Act (CCPA)of 2011

The CCPA 2011 is Bhutan's comprehensive legal framework for ensuring the rights, care, protection, and well-being of children, in line with international child rights standards, especially the UN Convention on the Rights of the Child (CRC). The Act aims to create a protective, nurturing, and enabling environment for every child in Bhutan, ensuring their survival, development, protection, and participation. The CCPA 2011 reinforces Bhutan's commitment to building a society where every child grows up safe, respected, and empowered.

Penal Code (2004), and the amendments in 2011 and 2021

The Penal Code of Bhutan 2004 is the primary criminal law framework of the country, designed to protect public order, ensure justice, and uphold Bhutanese values. It defines criminal offenses, prescribes punishments, and lays down legal procedures for fair and effective administration of justice. The amendments to the Penal Code in 2011 and 2021 demonstrate Bhutan's commitment to strengthening its legal system and addressing critical issues like child protection and human trafficking.

National Gender Equality Policy (2020)

The National Gender Equality Policy (NGEP) in Bhutan, approved in 2020, aims to provide a framework for ensuring equal rights, opportunities, and benefits for all individuals, regardless of gender, across various sectors and societal levels. It focuses on promoting gender equality through political, social, and economic domains, and is currently being reviewed to integrate perspectives of the LGBTQI+ community. The policy also guides the Royal Government of Bhutan (RGoB) in achieving gender equality through gender-responsive policies, plans, and programs.

Key institutions like NCWC, RBP, and RENEW play critical roles in awareness and survivor support. Since 2021, Women and Child Protection Desks have been established in all 20 dzongkhags, serving over 12,000 women and 3,700 children affected by GBV (UNICEF, 2024). Despite this, limited access to shelters, legal aid, and medical services in rural areas continues to hinder progress. Most advanced services remain concentrated in Thimphu, creating urban–rural disparities (Kuensel, 2024). To bridge these gaps, RENEW opened three new community service centers in 2025, located in Phuentsholing, Dagana, and Trashigang - targeting remote gewogs such as Logchina (One Billion Rising, 2025). NCWC's 2025 Shelter Advisory and the launch of the 2024–2028 National GBV Strategy aim to improve service quality and nationwide coverage (NCWC, 2025; UNDP, 2025).

6.2 SUPPORT SERVICE ACCESS

Organizations like the NCWC and RENEW are crucial in supporting survivors of gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH). The RBP manages reports related to sexual harassment and exploitation; however, many survivors hesitate to report due to cultural stigma, fear of retaliation, and mistrust of authorities. A 2022 NCWC study highlighted reasons for underreporting, including fear of job loss or social rejection, lack of support from supervisors, and concerns about making the situation worse. To address these issues, Bhutan has increased awareness campaigns and improved survivor services through collaborative efforts between healthcare providers, law enforcement, and social organizations. Despite progress, challenges like limited funding, digital illiteracy, and unequal access to information especially among women continue to affect effective support (NCWC, 2022; UNICEF Bhutan, 2024).

Referral pathways based on the multisectoral model are critical to ensuring a coordinated and survivor-centered response to cases of Sexual Exploitation, Abuse and Harassment (SEA/SH). These pathways clearly define the roles and responsibilities of various service providers, legal, health, psychosocial, and protection actors, at national and local levels. To strengthen accessibility and clarity, the table below outlines the roles, contact details, and services of each stakeholder. This enables timely referrals, informed decision-making, and efficient service delivery across sectors.

Table 2: GBV/SEA/SH Service Providers

Agency	Actors SEA/SH	Role in Referral Pathway	Key Services Provided	Contact Information
Royal Bhutan Police (RBP)	Investigation & Protection	Primary entry point for survivors, especially for legal protection and emergency response	• 24/7 National Helpline (1010) • Filing of complaints & investigations • Immediate protection from perpetrators • Women & Child Protection Unit (WCPU) • Referrals to health and psychosocial support	Emergency Helpline: 1010 WCPU (Thimphu) Email: www.rbp.gov.bt
JDWNRH & District Hospitals	Medical & Trauma Care	Health-based entry point for survivors; mandatory medical response & referrals	• Emergency medical treatment • Sexual assault evidence collection • post-exposure prophylaxis (PEP) • Mental health and trauma care • Child protection	JDWNRH Emergency: +975-2-322602 Email: www.jdwnrh.gov.bt

			screenings and referrals	
RENEW	Counselling & Shelter	Non-governmental organization for holistic GBV response; frontline psychosocial support	• Shelter homes & safe spaces • Psychosocial counselling • Legal aid and case management • Awareness and outreach • CBSS volunteer network	Toll-Free Helpline: 1098 Head Office: +975-2-333534 CBSS: Available in all 20 Dzongkhags
NCWC	Coordination & Legal Service	National policy and coordination body; child and women protection referral hub	• Case referral coordination • Child protection services • Oversight of WCPU and district focal persons • Advocacy and legal support	Hotline: +975-2-334549 Email: info@ncwc.gov.bt www.ncwc.gov.bt
The PEMA Secretariat	Trauma counselling	Specialized agency for mental health and wellbeing	• Trauma-informed counselling • Referral of survivors with mental health needs	Tel: +975-2-330566 Email: info@pema.gov.bt www.pema.gov.bt
District Women and Child Focal Persons	Local case coordination	Frontline contact at district level under NCWC coordination	• Identification and referral of survivors • Local coordination with hospitals, Police, RENEW, CBSS • Awareness and prevention programs	Contact via Dzongkhag Administration Office (Varies by District)
CBSS Volunteers (RENEW)	First response & referral	Community-based frontline workers embedded in local communities	• First response for survivors • Immediate referral to services • Confidential local support • Community outreach, awareness &	Available in all 20 districts Contact via RENEW HQ or CBSS Coordinator

			prevention of GBV, Domestic violence, sexual and reproductive health and legal rights.	

7 SEA/SH Prevention and Response Action Plan

Objectives of the SEA/SH Action Plan

The SEA/SH Prevention and Response Action Plan for the LRCP construction project outlines a comprehensive, survivor-centered strategy to prevent and address sexual exploitation, abuse, and harassment, especially in settings where large male workforces interact with female workers and nearby communities. Grounded in a gender assessment and aligned with national laws and World Bank safeguards, the plan emphasizes prevention, early detection, and survivor support through localized training and awareness, stakeholder engagement, and the establishment of a dedicated grievance redress mechanism committee.

The plan addresses SEA/SH risks across the project's full lifecycle from construction through operational phases recognizing that risk profiles evolve as the project transitions from infrastructure development to service delivery. During construction, risks primarily stem from worker-community interactions, while operational risks focus on passenger safety and harassment in transit environments. By embedding safety features into infrastructure design and establishing both project-phase and operational grievance mechanisms, the plan ensures sustainable protection for women and girls beyond project completion.

Key components include adapted awareness training materials for SEA/SH in English and Dzongkha, capacity-building for project actors, monthly consultations with community stakeholders, rollout of a Code of Conduct, provision of gender-segregated facilities, and periodic monitoring and evaluation. The approach prioritizes confidentiality, accountability, and inclusion to ensure the project is implemented ethically and responsibly while promoting gender equality and community safety.

SEA/SH Prevention and Response Action Plan

Table 3 outlines the SEA/SH Prevention and Response Action Plan, detailing procedures and protocols that will be enforced throughout the project. The plan includes measures for:

- Preventing SEA/SH occurrences
- Reporting and managing SEA/SH allegations
- Providing survivor-centered support and referrals

- Ensuring accountability through a clear grievance redress mechanis

This integrated approach aims to safeguard affected communities, particularly vulnerable groups, while ensuring the responsible and ethical implementation of all project components.

SEA/SH Risk Mitigation Across Project Lifecycle

The LRCP addresses SEA/SH risks across two distinct phases with tailored prevention and response measures:

Construction Phase SEA/SH Risks

During road construction and upgrading activities, SEA/SH risks are primarily associated with:

- Influx of construction workers into rural communities
- Power dynamics between workers and local populations
- Presence of work camps and interaction with community members, particularly women and girls
- Worker-to-worker harassment within construction sites

Mitigation Measures:

- Mandatory Code of Conduct for all workers and contractors with SEA/SH provisions
- Gender-sensitive worker camps with clear access restrictions and security protocols
- Community awareness campaigns conducted by the GBV Service Provider on SEA/SH risks and reporting channels
- Worker training on prohibited behaviors and consequences
- Confidential GRM channels accessible at all construction sites
- Regular monitoring and enforcement of contractor compliance

8 SEA/SH GRM during Construction

8.1 SEA/SH GRM Architecture

The project will implement a differentiated SEA/SH complaint pathway that is separate but linked to the general project GRM. SEA/SH complaints may be received through the broader project GRM entry points (SMS, email, drop boxes, walk-in) or directly through specialized service providers (RENEW hotline, NCWC, District Women and Child Focal Persons, CBSS Volunteers). Once identified, SEA/SH complaints will be immediately channeled into a confidential SEA/SH pathway overseen by a specialized SEA/SH GRM structure, with external referrals managed by the project Gender/GBV Specialist and GBV Service Provider supported by external service providers.

8.2 Institutional Structure and Roles

1. SEA/SH GRM Committee (PMU Level - Department of Human Settlement)

Composition: PMU Director (Chair), E&S Safeguards Specialist, Gender/GBV Specialist, Representative from RENEW/GBV Service Provider

Roles and Responsibilities:

The Project SEA/SH Committee is responsible for addressing project-linked SEA/SH cases through accountability measures while working in close collaboration with RENEW Community Service Center (CSC) for survivor support.

Case-Related Functions:

- Conducts fact-finding and assessment for cases determined to be project-linked (following linkage assessment by the Project GBV Specialist)
- Takes disciplinary action against project personnel or contractors found to have committed SEA/SH violations
- Develops and implements corrective action plans to address systemic issues
- Ensures survivors maintain continued access to services throughout the process
- Closes cases after appropriate project-related actions are completed

Coordination:

- Collaborates with RENEW/CSC on all cases, with RENEW leading survivor case management
- Coordinates referrals to external service providers (RBP/WCPU, health facilities, legal aid, safe homes) based on survivor needs and consent

- Works with the Project GBV Specialist on linkage assessments and response protocols

Decision-Making Boundaries:

- Makes decisions on project accountability actions (disciplinary measures, contractor sanctions, workplace corrective actions)
- Does NOT make decisions on survivor services, case management, legal actions, or medical care.
- Does NOT replace RENEW/CSC's role in survivor-led case management

Confidentiality:

- Operates under strict confidentiality protocols with need-to-know access only
- All members sign confidentiality agreements
- Case information is anonymized in project reporting
- Individual case details are never disclosed beyond committee members with legitimate need-to-know

2. SEA/SH GRM Focal Point (PMU Staff)

Responsibilities:

- Coordinates day-to-day SEA/SH GRM implementation across all project components
- Receives and acknowledges SEA/SH complaints within 24 hours
- Ensures immediate referral to appropriate service providers within 72 hours
- Maintains confidential communication with survivors and service providers (strict need-to-know basis)
- Tracks referrals using anonymized codes in encrypted, access-controlled systems
- Liaises with Gender/GBV Specialist and service provider case managers

Confidentiality Safeguards: The Focal Point operates under strict confidentiality agreements. Individual case details are NEVER disclosed to management, contractors, or community-level structures.

3. Gender/GBV Specialist (PMU Consultant)

Responsibilities:

- Provides technical guidance on survivor-centered response and GBV case management principles
- Trains PMU staff, GRM Committees, and contractors on SEA/SH response protocols
- Ensures alignment with World Bank ESF requirements and Bhutan's national GBV protocols
- Conducts quarterly spot checks to verify survivor-centered procedures remain active
- Supports the SEA/SH GRM Committee in maintaining functional referral arrangements

- Coordinates with GBV service providers and external agencies

4. GBV Service Provider for SEA/SH Response

To ensure professional, survivor-centered handling of SEA/SH cases, the project will contract a specialized GBV Service Provider, preferably a Civil Society Organization (CSO) with demonstrated expertise in GBV prevention and response. The Service Provider will be an integral part of the project structure, supporting both prevention and response activities.

Core Functions:

- Prevention and Capacity Building:
- Conduct GBV/SEA/SH risk and hotspot mapping in project areas to identify vulnerable locations and populations
- Deliver awareness campaigns and community engagement activities on SEA/SH prevention, reporting channels, and available services
- Provide training to PMU staff, contractors, local government officials, and other project actors on survivor-centered response, Code of Conduct, and SEA/SH risk mitigation
- Develop Standard Operating Procedures (SOPs) for SEA/SH response aligned with Bhutan's National GBV SOP and World Bank ESF requirements

GRM Integration and Response:

- Receive and manage SEA/SH cases reported through project GRM channels or directly through the Service Provider's own confidential channels
- Provide survivor-led case management including psychosocial counseling, safe shelter, crisis intervention, and coordination with medical and legal services
- Offer technical guidance to the SEA/SH GRM Committee and Focal Point on maintaining survivor-centered procedures and confidentiality protocols
- Coordinate referrals to external service providers (RBP/WCPU, hospitals, NCWC, PEMA, District Women and Child Focal Points) based on survivor needs and consent
- Manage all SEA/SH data using anonymized codes in secure, access-controlled systems, reporting only aggregated statistics to the project

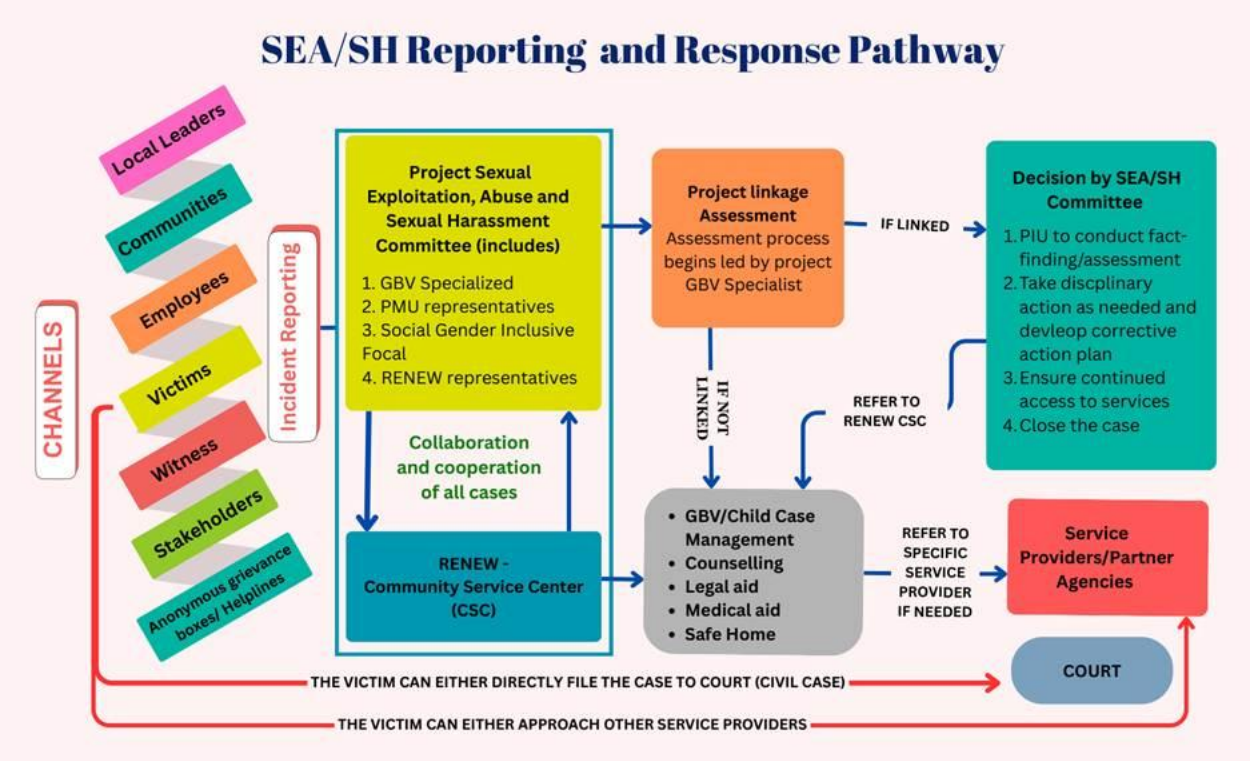
The Service Provider will maintain strict confidentiality in case handling, while working collaboratively with the project team on prevention, training, and system strengthening activities.

5. External Service Provider

A range of service providers in Bhutan deliver coordinated, survivor-cantered support for SEA/SH cases, each with distinct roles. The Royal Bhutan Police through its Women and Child Protection Units handles legal assistance, complaint registration, investigations (with consent), and protection services, while RENEW provides psychosocial counselling, safe shelter, hotline services, and survivor-led case management. Health facilities such as district hospitals and BHUs offer medical care, including post-exposure prophylaxis, emergency contraception, and forensic documentation. The National Commission for Women and Children focuses on child protection, counselling, and coordination, and the PEMA Secretariat supports survivors with legal aid and court processes. At the local level, district focal persons and CBSS volunteers facilitate awareness, referrals, and trusted reporting. Importantly, these providers operate independently of the SEA/SH GRM Committee, engaging through formal agreements to ensure a well-coordinated response.

8.3 SEA/SH Referral Pathway Flowchart

The following flowchart illustrates the SEA/SH complaint pathway, showing how complaints are received, immediately differentiated from general grievances, channeled through the SEA/SH GRM structure, and referred to external service providers for survivor-centered case management. This is a general SEA/SH GRM adopted by all Word Bank financed large infrastructure projects in Bhutan. A project specific GRM detailing the roles and responsibilities will be developed by the Project GBV specialist.



Operational/User-Facing Road Safety and SEA/SH Risks

During operation, SEA/SH risks shift to road user safety and harassment in transit environments:

- Sexual harassment of women and girls using public transport and waiting at bus stops
- Inappropriate driver conduct toward passengers
- Safety risks for pedestrians, particularly women and children, using improved roads
- Poorly lit roadside areas, bus stops, and rest areas creating unsafe environments
- Lack of emergency response mechanisms for passengers and road users experiencing harassment or distress

Design-Embedded Safety Features:

The project design incorporates road user safety measures that directly mitigate SEA/SH risks:

- Physical Infrastructure: Adequate lighting at bus stops, roadside rest areas, and pedestrian crossing points; safe pedestrian pathways; separate waiting areas where culturally appropriate; visible sight lines to reduce isolated spaces

- Surveillance and Monitoring: CCTV installation at key bus stops, terminals, and roadside facilities to deter harassment and support incident investigation
- Emergency Response Features: Emergency call buttons or panic alarms at major bus stops and terminals; clearly marked emergency contact information; accessible help points at facilities
- Driver Accountability: Driver identification systems visible to passengers on City Bus Service vehicles; complaint mechanisms displayed in buses and at bus stops; driver Code of Conduct requirements in operator agreements
- Accessible Reporting: Prominently displayed complaint contact information (hotline numbers, SMS, email) at all bus stops, terminals, and roadside facilities; visual materials showing how to report harassment; multilingual and pictorial signage for accessibility

Operational Phase Grievance Mechanism

City Bus Service GRM:

A fully functioning operational GRM for bus services and related transport infrastructure will be developed and implemented by the City Bus Service prior to the commencement of operations. This operational GRM will be managed independently by the City Bus Service and will include:

- **Scope:** Passenger complaints related to driver conduct, harassment on buses or at bus stops, safety concerns at terminals and facilities, service quality issues, and SEA/SH incidents involving City Bus Service personnel or occurring within City Bus Service infrastructure
- **Reporting Channels:** Multiple accessible channels including dedicated hotline, SMS, online complaint portal, complaint boxes at bus terminals, and in-person reporting to bus terminal managers
- **SEA/SH Provisions:** Specific confidential pathways for handling SEA/SH complaints with immediate referral to specialized service providers (RENEW, RBP/WCPU, health facilities) following survivor-centered protocols
- **Accountability Mechanisms:** Clear procedures for investigating driver misconduct, disciplinary actions for Code of Conduct violations, and regular reporting on complaint resolution
- **Capacity Building:** Training of all City Bus Service staff, drivers, and terminal personnel on passenger safety, SEA/SH awareness, and GRM procedures

The detailed framework for the City Bus Service operational GRM will be developed during project implementation in coordination with the Thimphu Thromde and Ministry of Infrastructure and Transport,

incorporating lessons learned from the project's SEA/SH GRM and ensuring continuity of safety standards established during the construction phase.