Fiji Roads Authority

Critical Bridges Resilience Project
SEAH CASE HANDLING & REFERRAL PATHWAY PROCEDURE

⚠ IMPORTANT - READ BEFORE USE

SEAH cases must NOT be processed through the standard Grievance Redress Mechanism (GRM) pathway.

Police involvement requires the survivor's explicit informed consent, or a legal obligation to report (e.g. offences involving minors).

This document sets out the differentiated SEAH pathway only.

1. Purpose and Scope

This procedure sets out the case handling and referral pathway for allegations of Sexual Exploitation, Abuse and Harassment (SEAH) arising in connection with the Critical Bridges Resilience Project (CBRP). It applies to all FRA project staff, the Project Management Unit (PMU), the Supervision Consultant, and all works Contractors and their personnel engaged on the Project.

SEAH allegations require a fundamentally different response from other project grievances. This pathway must be used in place of, and must never be diverted into, the standard GRM process described elsewhere in the Project's grievance redress procedures.

2. Guiding Principles

Do No Harm	Survivor safety and dignity are the paramount concern at every stage of the process.
Confidentiality	All SEAH information is treated as strictly confidential and shared only on a need-to-know basis.
Anonymity	The survivor's identity is never disclosed without their explicit, informed consent.
Non-Retaliation	Retaliation against a complainant or any person cooperating with the process is strictly prohibited.
Survivor-Centred Referral	The Fiji Women's Crisis Centre (FWCC) and the Medical Services Pacific (MSP) are the primary referral service provider that can be offered to the Survivor throughout Project implementation.
Differentiated Pathway	SEAH complaints must not be processed through the standard GRM pathway.
Responsiveness	Every SEAH report received must be acknowledged within 24 hours, with information on available support provided at that point. This 24-hour clock starts from the point a report is received, not from when the incident occurred -delayed disclosure, sometimes months later or only surfacing at project close, is common and

	does not affect the survivor's right to a prompt response once they come forward.[1]

3. Differentiated Reporting Pathway

SEAH complaints must not use the standard GRM flow. This section governs all SEAH complaints. The correct process depends on the source of the complaint: whether it is raised by a third party, or filed directly by the survivor. If a SEAH complaint reaches any GRM step beyond the entry point, it has been misrouted and must be transferred here immediately.

PROCESS A: THIRD-PARTY COMPLAINT	PROCESS B: SURVIVOR-FILED COMPLAINT
STEP 1 **Record complaint Intake and Acknowledge** *Log in the confidential SEAH register; assign a PSEAH Focal Point.* *Inform ADB*	**STEP 1** **Record complaint Intake and Acknowledge** • *Inform the survivor of their rights and confidentiality protections.* • *Inform ADB* • *Provide information on Services available* *Follow survival wish and consent only then referral of services available can be made*
STEP 2 **Administrative investigation** *Do NOT seek out or contact the survivor - the Do No Harm principle applies absolutely.*	**STEP 2** **Administrative Investigation** *Internal Assessment to determine the level of incidence.*
STEP 3 **Outcome of Assessment** *Action taken against the perpetrator through standard HR/contractual procedures.*	**STEP 3** **Outcome of Assessment** *Disciplinary action if substantiated*
STEP 4 **Document and report** *Reported to FRA PST and ADB/WB in anonymised form and Corrective Action*	**STEP 4** **Police involvement** *Requires the survivor's explicit informed consent, and subject to the National Laws. (e.g. offences involving minors).*
	STEP 5 **Document and report** *Reported to FRA PST and ADB/WB in anonymised form & Corrective Action*

[1] ADB. 2023. *Integrating Sexual Exploitation, Abuse, and Harassment Reporting and Case Handling into Project Grievance Redress Mechanisms*. Manila: Asian Development Bank. Section I.C.1 "Responsiveness," p. 6, and Section VI "Informing Upward and Accountability," p. 40 (24-hour acknowledgment/reporting rule). The clarification that the clock runs from receipt of a report rather than from the incident, and the note on delayed disclosure, are not direct GPN quotations; they draw on the underreporting guidance at p. 29 and are supplied here for local practice.

4. Contractor Obligation- Both Processes

Independent duty to investigate

The Contractor has an independent obligation to conduct an administrative investigation whenever a SEAH allegation is made against one of its employees -regardless of whether the survivor files a complaint, whether police become involved, or whether the survivor consents to an investigation.

Where a criminal investigation is underway, it takes precedence: the administrative investigation should normally be paused pending its outcome, unless a parallel track is agreed with the investigating authority and the survivor (e.g. where the criminal process is expected to take a long time). Even if a criminal investigation does not proceed or is unsubstantiated, the Contractor may still need to complete an administrative investigation and take action, since the standard of proof for a code-of-conduct breach is lower than for a criminal conviction.[2]

5. Key Contacts – CBRP SEAH Referral Pathway

FRA SEAH FOCAL POINT /FRA SAFEGUARDS MANAGER
Fiji Roads Authority Manager of Safeguards (Environment & Social) Mr Eliki Ceinaturaga Eliki.ceinaturaga@fijiroads.org
PRIMARY REFERRAL SERVICE
Medical Services Pacific (MSP) MSP Headquarters Suva, Fiji: 355 Waimanu Road, Suva, FIJI; Suva Office Phone: (+679) 3315295;
Fiji Women's Crisis Centre (FWCC) Hotline: 1560 (24-hour, toll-free) Suva: +679 331 3300 www.fwcc.org.fj

6. Reporting, Disclosure and Register

6.1 Confidential SEAH Register

- All SEAH cases are recorded, whether or not substantiated.
- The register is maintained jointly by the Contractor and the FRA Project Support Team (PST).
- The register must NOT include identifying information about the survivor.
- SEAH case data is reported to ADB and the World Bank in semi-annual safeguards monitoring reports, in aggregate, anonymised form.

6.2 Community Disclosure

- The GRM is disclosed at community consultation meetings prior to the commencement of civil works at each bridge site.
- A summary brochure is made available at village meeting halls and women's meetings.

[2]ADB. 2023. *Integrating Sexual Exploitation, Abuse, and Harassment Reporting and Case Handling into Project Grievance Redress Mechanisms*. Manila: Asian Development Bank. Section V.C "Primacy of Criminal Investigations over Administrative Investigations," p. 35, points (iii)(a)–(c) (precedence and postponement/parallel-track exception) and point (v) (administrative action still possible where the criminal case is unsubstantiated, given the lower standard of proof).

- SEAH reporting pathways are disclosed through targeted awareness sessions and Contractor inductions, held as separate sessions for men and women.
- FWCC contact details are displayed on project pamphlets and signboards at all bridge sites.
- Both successfully addressed complaints and non-responsive issues are reported to ADB and the World Bank.

6.3 Awareness Materials

Diagram summary cards, produced in English, Fijian and Hindi, are displayed on project signboards at each bridge site and made available at village meeting halls, to ensure the referral pathway is accessible to all project-affected communities.

Quick reference - how to respond to a SEAH disclosure

1. Listen, believe, and do not investigate the survivor.
2. Explain confidentiality and offer the MSP & FWCC referral (Toll Free Helpline 1560) and Child Helpline 1325
3. Record in the confidential SEAH register - no identifying details.
4. Notify the PSEAH Focal Point.
5. Do not contact the alleged perpetrator or the survivor beyond this initial response without further guidance.