



HOW TO SUPPORT YOUR COMPANY TO...

Develop a community-based grievance mechanism for sexual exploitation and abuse

IN PARTNERSHIP WITH



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October 2021

Photo:
Nebiba Mohammed at the Shints textile factory in Ethiopia.
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4-step process to develop a community-based grievance mechanism for **sexual exploitation and abuse**

1

PLANNING



Hire a GBV Specialist



Conduct a GBV context assessment



Build mutually beneficial GBV partnerships

4

MONITORING



Measure community satisfaction



Check staff awareness



Assess partner performance

Sexual exploitation is any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.

Sexual abuse is any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive condition.

Sexual exploitation and abuse (SEA) versus sexual harassment

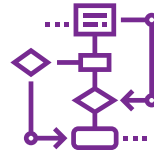
In IFC financed projects, SEA occurs when somebody connected to the project seeks to gain sexual favors from a community member or service user as a condition of their access to goods, services, employment, contracts etc.; or vice versa. Sexual harassment occurs between project personnel, and involves any unwelcome sexual advance or unwanted verbal or physical conduct of a sexual nature. The distinction between the two is important so that company policies and staff training can include specific instruction on the procedures to report each.

2

DESIGNING



Consult
with local
communities



Decide on
the best
model



Write
protocols

3

IMPLEMENTING



Communicate
policy & grievance
mechanism



Build
capacity



Handle
reports

1 PLANNING



Hire a GBV Specialist

Planning to set up a community-based grievance mechanism for SEA requires technical expertise. Your company will benefit from engaging a GBV specialist, who can help during the planning phase and with implementation.

CORE SKILLS AND EXPERIENCE OF A GBV SPECIALIST

- In-depth understanding of ethical considerations for conducting GBV research.
- Capacity to collect, store, analyze, and operationalize GBV data in line with international standards.
- Demonstrated experience using the survivor-centered approach in GBV research and practice.
- Knowledge of GBV assessment tools.
- Ability to develop an appropriate and inclusive methodology to explore GBV context in local communities.
- Experience using diverse methods and tools for collecting information on GBV.
- Experience analyzing GBV information to inform safe and effective prevention and response measures.
- Capacity to assess skills, capacities, and quality of GBV service providers.
- Capacity to assess gender and GBV attitudes and knowledge.
- Demonstrated experience in managing GBV disclosures.



To identify a suitable GBV Specialist for this work, your company should consult with local organizations working in the areas of gender and GBV – especially those offering services to women, adolescent girls, and children. If strong local expertise in GBV assessment and GBV data analysis is not locally available, the company may need to engage international expertise.



Conduct a GBV context assessment

The GBV Specialist will need to complete a range of tasks to be able to understand clearly what are the most significant GBV risks in the community and how a grievance mechanism can best serve the needs of vulnerable groups.

COMMON ASSESSMENT ACTIVITIES

- Desk review of reports and other publications, including academic work and blogs, that offer GBV information at the local, regional, and national levels.
- Focus group discussions with adults and adolescents.
- Interviews and informal discussions with community leaders, clinic doctors and nurses, police and security forces, and with representatives of GBV service providers, women's networks, and government.
- A safety mapping to identify safe and unsafe locations, and to understand perceptions of safety and risks among various groups in the community.
- A service mapping to identify the range of services available in the community, hours of operation, contact information, fees, and any constraints particular groups may face accessing the various services.

REQUIRED INFORMATION AND KNOWLEDGE

The assessment should seek only information and knowledge relevant to help your company set up an effective and accessible community-based SEA grievance mechanism. This may include:

- National gender and GBV laws.
- Communication practices and preferences across a wide range of community groups.
- Community hierarchies and leadership structures.
- General status of gender equality in local community systems and practices.
- Specific status of women in the local community, including livelihood opportunities, freedom of movement, and decision-making power in the community and in families.
- Limitations to the social and economic empowerment of women and girls.



Build mutually beneficial GBV partnerships

Partnerships will help your company manage a safe and accessible community-based SEA grievance mechanism, with access to a referral pathway for survivors. Through these partnerships, your company can also make a positive contribution to GBV prevention in the community.

SELECTION PROCESS FOR GBV PARTNERS

The GBV Specialist will need to conduct a GBV service mapping to learn about the existence and capacities of potential local partners. This mapping should produce:

- A list of potential partner organizations, with relevant contact details, offered services, and fees.
- Detailed information on each organization covering previous work, funding models, media coverage, mission statement, organizational chart, staff numbers and experience, resources and office set-up, general activities and community-specific activities, and reputation in the community and among other service providers.
- A score-based competency analysis and evaluation of shortlisted service providers ensuring coverage of core GBV services (medical, legal and psychosocial), if possible.



Selected partners should be trusted in the community, especially among women and girls, to encourage people to report SEA incidents and to seek support. The selection of partner organizations should be undertaken in consultation with community groups.

- Help seeking behaviors and coping mechanisms, especially among women and girls.
- Existence of community-based support networks, both formal and informal.
- Existence of barriers to accessing core services (education, health, etc.) – especially for women, girls, and vulnerable groups.
- Existence of any behaviors or cultural norms that might place women and girls at risk of GBV, including any traditional or religious rituals.
- Community attitudes towards sexuality and sexual health.

PARTNER RELATIONSHIPS

Your company should create formal partnerships with GBV service providers that can provide support throughout the lifecycle of the project. These partnerships should result in positive long-term relationships between the company, the service provider, and the community.

A Memorandum of Agreement offers a transparent means of managing partnership expectations, including distinct activities the partner will carry out, timelines for completing work, costs, and how the impact of their work will be assessed. The GBV Specialist will be able to advise on what support is needed and will be most useful, based on the findings of their service mapping activity.

Local organizations often have limited funds and are staffed by volunteers. Your company should expect to pay for any services or assistance they receive from these organizations. Your company should also consider offering financial support for capacity building of partner staff, provision of resources, and/or upgrading of infrastructure. This support can help improve services in the community and serve as a lasting impact of the project.



Some GBV services may not be available or accessible. In this case, it is important not to raise unrealistic expectations in communities about the support SEA survivors may be able to receive.



It may not be necessary to conduct a new GBV context assessment if one has been recently completed by a trusted local organization. GBV assessments can present risks to community members. This may also be an unnecessary duplication of work. Has your company first checked to see if such an assessment has already been done?



Collecting information about specific GBV cases or the incidence of GBV in communities requires a high level of expertise and compliance with strict ethical guidelines. This level of detail carries risks and is not required for the company to determine what model for a SEA grievance mechanism will best serve the needs of the community.

2 DESIGNING



Consult with local communities

Your company's SEA grievance mechanism should be created based on the outcomes of consultations with and feedback from community members. This helps ensure the reporting channels and available services are safe, inclusive, accessible, and needed.

Consultations about what model of grievance mechanism will be the most suitable should factor in the views of different demographics in the community, based on gender, age, language, ethnicity, sexual orientation, religion, legal status, physical and mental ability etc. These consultations require a high level of sensitivity, awareness, and support for equal rights for all persons.

Participation in these consultations should be voluntary and anonymous. The consultations should be held in private locations. If it is not possible to secure a private and confidential space for holding a particular consultation, the GBV Specialist will need to adjust their questions and activities so as not to place participants at risk if they overheard speaking about GBV specifically.

The consultations may include:

- Discussions about personal safety and risks in the community.
- Preferred ways for the company to provide feedback to the community.
- Preferred methods of reporting incidents in breach of the company's SEA code of conduct.



These consultations could happen at the same time as the GBV context assessment – to minimize the amount of time that community members and service providers are asked to give. Your company should also consider giving some kind of payment (e.g., transport, token fee, lunch) to community members who attend group sessions.



Consultations should not include any direct questions about GBV risks and experiences.

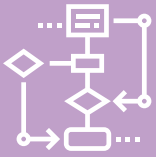


Write protocols

Your company will need to document the protocols for their grievance mechanism. This will help them understand and visualize how the whole process works – and where there might be gaps. It will also inform the communication and training materials that come later.

The protocols should describe in clear and detailed terms the following aspects of the grievance mechanism:

- A brief statement of the company's accountabilities and commitment.
- Available reporting channels.
- How the community is informed of their rights and how to utilise the grievance mechanism.
- How reports are processed as soon as they are received.
- Responsibilities for managing reports – both for internal staff and external GBV services providers or specialists.
- Availability of GBV support services.
- Investigation procedures and responsibilities.
- How information about reports is managed.
- **How** feedback is provided to the community.



Decide on the best model

There are three basic models your company can choose from. The choice of model will depend on a number of factors – community preference, availability of local expertise and services, and capacity of internal staff and external partners. Monitoring should be included in any model.

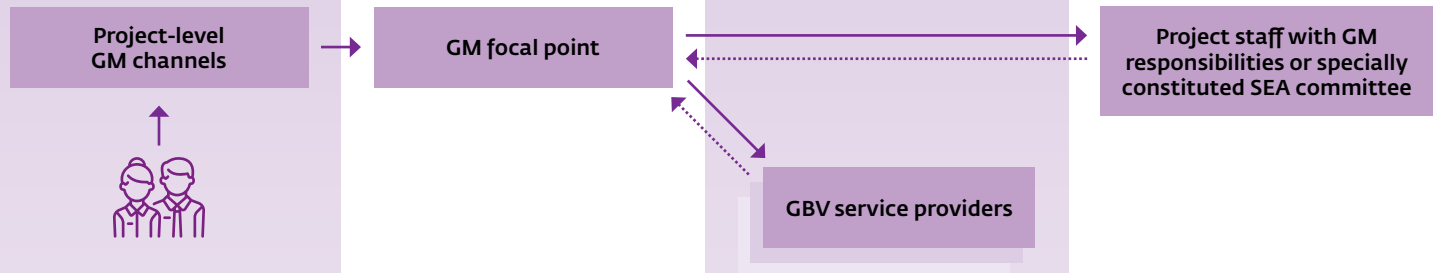
Allegation entry points

Allegation sorting, processing, and monitoring

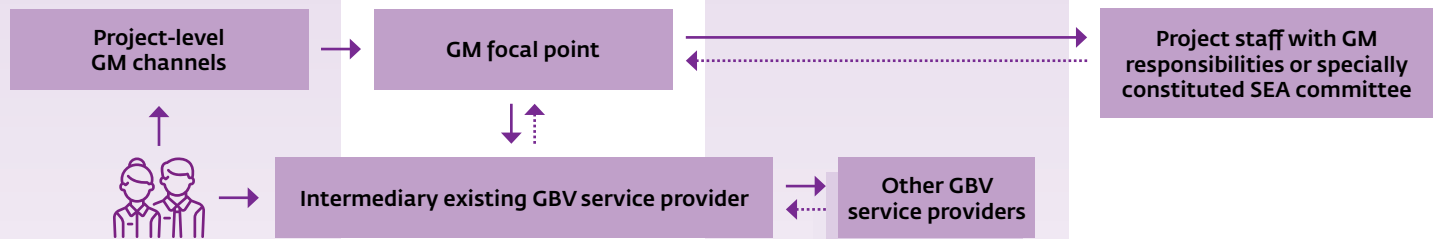
Provision of adequate support services to the survivor

Allegation verification, investigation, and action

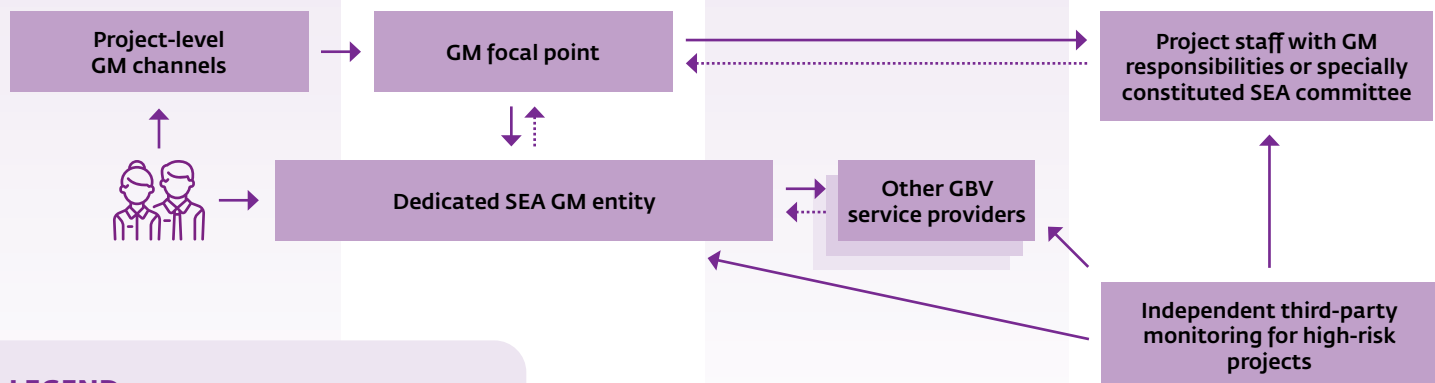
Model 1: Adapt the overall project grievance mechanism to include SEA allegations



Model 2: Link up the project grievance mechanism to an existing intermediary to handle SEA allegations



Model 3: Outsource SEA allegation management to a third party



LEGEND

- Reporting line
- Allegation transfer line



In some locations, other companies or humanitarian agencies may have already established a community-based SEA grievance mechanism and a referral pathway for SEA survivors. Your company should consider using these to reduce duplication of effort and resources. A shared approach may also make the mechanism easier to understand and access for community members.

3

IMPLEMENTING



Communicate policy & grievance mechanism

It is important all aspects of the SEA grievance mechanism are well-communicated among staff and in communities. This includes information on what kinds of issues should be reported, how to report, and what to expect after a report is made.

FOR STAFF

Key content

- Company commitment to responding to all allegations of SEA.
- Specific behaviors that are considered SEA – also identified in the Code of Conduct.
- Reporting process and channels if they become aware of an incident.
- Limits on direct contact with survivors.

Possible activities

- Introduce during induction.
- Toolbox talks.
- Posters targeting specific behaviors.
- Code of Conduct and grievance mechanism training module.
- Key points in safety check.

FOR COMMUNITIES

Key content

- Company commitment to responding to all allegations of SEA.
- What to report.
- How to report.
- Assurance of confidentiality and anonymity.
- Availability of support services.

Possible activities

- Community meetings.
- Health awareness sessions.
- School talks.
- Print material advertising reporting channels – in multiple languages and pictorial formats.
- Alternative communication methods – song, theater, dance etc.



Build capacity

It is likely there will be some gaps in skills and services required to manage the SEA grievance mechanism safely and effectively. Your company should consider how they can support capacity-building of staff and external organizations to address these gaps.

Key skills required for safe management of the SEA grievance mechanism

- Survivor-centered responses to a disclosure – when a person shares an experience of SEA.
- Confidential and secure management and reporting of information relating to SEA cases.
- Conducting fair investigations into allegations.
- Monitoring and evaluating the effectiveness of the grievance mechanism, including accessibility of reporting channels, and quality of GBV services provided.
- Monitoring satisfaction of survivors who access services.

Key services required to ensure adequate support for SEA survivors

- Case management – a structured method whereby one organization takes responsibility for making sure survivors are informed of their options for accessing support services and provided with emotional support throughout the process.
- Health and medical care.
- Mental health and psychosocial support, both short-term and long-term.
- Legal and justice assistance.
- Safety and security options – such as women's shelters.
- Long-term assistance, including access to education and livelihoods opportunities, and community reintegration.
- Specific care for child survivors.



Handle reports

It is expected your company will engage an external GBV Specialist or service provider to manage SEA allegations, especially any interaction with survivors to help link them to available services and support.

RECEIVING REPORTS

The community-based grievance mechanism should provide multiple options for reporting SEA incidents, based on the outcomes of the community consultations. Ideally, and regardless of the channel used, the report should go directly to an assigned GBV focal point. This will help survivors access support quickly and reduce breaches in confidentiality.

The GBV focal point should be fully trained in how to receive reports, provide the survivor with information about the support services they can access, and manage all information relating to the incident in a confidential and sensitive manner.

Anybody who works in the community or who may come into contact with community members should be prepared to receive SEA disclosures.

Your company should therefore ensure these workers receive training on:

- applying the GBV guiding principles when responding to a disclosure; and,
- knowing the protocols to follow to ensure survivors can be referred to the GBV focal point.



Non-skilled personnel should never involve themselves in responding to an allegation or incident of SEA. This includes providing support services to survivors, investigating what happened, or seeking to approach perpetrators.

MANAGING INFORMATION

Your company will need to consider how they can securely manage information on SEA reports. This is important to ensure confidentiality for survivors and reduce risk of exposing them to more harm, including retribution.

Key rules for good management of GBV information are:

- Individual cases should be documented and discussed using a code system and not include the names of survivors.
- The information recorded about particular incidents should be consistent, using a predefined template or 'intake form'.
- Survivors should be asked for their consent before any information about them is shared with any other person.
- All information must be stored securely – in locked cabinets or password protected.
- Only personnel who are directly responsible for managing a case should have access to any information about that case.
- Information should only be shared on a need-to-know basis and never in a way that risks exposing the identities of persons involved in incidents.
- Reporting between organizations should never include information relating to specific cases.

CONDUCTING INVESTIGATIONS

Your company may want an investigation to take place. It is understandable they will want to know if any of their workers were involved in the incident and, if so, to take disciplinary action. This is, after all, probably a commitment they have made in their Code of Conduct.

Suitable options for conducting the investigation are:

- Liaise with the relevant government department, if available (e.g., Social Welfare).
- Liaise with the GBV coordination network or GBV service providers who have expertise in managing investigations ethically and safely.
- Liaise with the local police authority, if safe to do so, and in cases where mandatory reporting rules apply.



The fewer people who are involved in managing reports, the lower the risk of causing harm to survivors, mismanaging incident information, and breaching confidentiality. Has your company limited the number of people involved in managing reports?

The main objective of the community-based SEA grievance mechanism is to ensure safe access to support services for survivors. Conducting investigations is secondary. Where does your company's grievance mechanism place the most emphasis?



Personnel should never make attempts to identify survivors. Your company is responsible for having in place the best grievance mechanism possible to make it easier and safer for survivors to self-report.

Any person with responsibility for conducting investigations must be properly trained to conduct the activity safely and without putting survivors at risk.

4

MONITORING



Measure community satisfaction

Does the grievance mechanism continue to offer safe reporting and quality support services over time?

Your company should view its community-based SEA grievance mechanism as a system that will evolve and improve over time. Initial community recommendations and preferences for reporting channels and support services may change, as communication methods and needs change.

Relationship building with local partners is a long-term process requiring a commitment of time and resources by your company. Within this relationship, your company has a responsibility to listen to the community and also to provide feedback to the community.

Your company should engage a GBV Specialist to conduct regular reviews of the following:

- Accessibility, use, and effectiveness of available reporting channels.
- Visibility of communication materials.
- Knowledge of the grievance mechanism in the community.
- Use of GBV support services and satisfaction levels among users.



Does the review methodology ensure the grievance mechanism continues to offer a safe reporting system for different demographic groups in the community?

Monitoring community feedback on how the system is working is an important component of a grievance mechanism. Has your company included this in their grievance mechanism protocols?



Check staff awareness

Do staff adequately understand the need for the grievance mechanism, how it functions, and their roles and responsibilities?

One-off awareness-raising is rarely enough for people to understand fully what is meant by SEA or why it is important to have effective prevention and response mechanisms in place. It is also not sufficient simply to tell staff about the existence of a grievance mechanism.

As part of on-going training and awareness-raising, your company should seek evidence their staff have acquired knowledge and skills. They should know:

- The definition of SEA and behaviors that constitute SEA.
- GBV basics, including the GBV guiding principles.
- How the grievance mechanism works, including what reporting channels are available.
- How to respond when somebody informs them of an incident of SEA.
- How to respond if the informant is a survivor.
- Where to refer the information and the survivor.



Do your company's capacity and knowledge-building efforts ensure there is additional, specialized training for staff with more responsibility – especially those who manage SEA incident information or investigations?



Assess partner performance

Are GBV service providers delivering quality support services and effective prevention programs?

Your company should delegate the responsibility of handling SEA incidents and running GBV prevention programs to local GBV partners. They should also seek to ensure these partners are performing well.

Your company should therefore ensure its funded partnership agreements includes some of the following monitoring and review practices:

- Distinct actions and targets.
- Measurable and achievable indicators.
- Collection of anonymous feedback from users of services.
- Quality control of communication and education materials.
- Attendance records at community events, GBV workshops etc.
- Surveys from participants in training.



Local organizations may not have the same capacity as large service providers. It is not realistic to expect them to be able to manage extensive administrative processes. Assessments of partner performance should therefore be reasonable and proportional. Is your company managing partner performance fairly and in a way that promotes learning and success?

For further resources, including guidance on *Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector*, please visit www.ifc.org/addressinggbvh