

# Case study

## EXPLORING CLIENT APPROACHES TO GENDER-BASED VIOLENCE PREVENTION AND RESPONSE

CLIENT:

Alcazar Energy

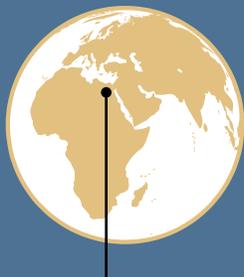
Energy, **EGYPT**

 **IFC** | International  
Finance Corporation  
WORLD BANK GROUP  
*Creating Markets, Creating Opportunities*



## Policy Overview

# Egypt



**Economy name:**  
Arab Republic of Egypt

**Main business city:**  
Cairo

**Region:**  
Middle East & North Africa

**Income level:**  
Lower middle income

**Population (2019):**  
100,388,073

**Female population:**  
49,665,476 (49.5%)

**Labor force participation rate:**  
22.1% female  
70.9% male

**Proportion of wage and salaried workers:**  
65.9% female  
69.9% male

**Proportion of self-employed workers:**  
34.1% female  
30.1% male



### Global rankings

Women, Business and the Law Indicator*	45.0/100
Gender Inequality Index†	102/162
Global Gender Gap Index‡	134/153
Middle East and North Africa Gender Gap Index‡	8/19
Wage equality‡	22/153
Economic participation and opportunity‡	140/153



### Women, Business and the Law\*

Can a woman get a job in the same way as a man?	No
Does the law prohibit discrimination in employment based on gender?	Yes
Is there legislation on sexual harassment in employment?	Yes
Are there criminal penalties for sexual harassment in employment?	Yes
Are there civil remedies for sexual harassment in employment?	No
Is there legislation specifically addressing domestic violence?	No



### Gender-based violence‡

Prevalence of lifetime domestic violence	26%
Prevalence of child marriage	17%

Unless otherwise indicated, all data for this overview were taken from WBG, World Development Indicators:

*Labor force participation rate, female (% of female population ages 15+) (modeled ILO estimate), (2020)*

*Labor force participation rate, male (% of male population ages 15+) (modeled ILO estimate), (2020)*

*Wage and salaried workers, female (% of female employment) (modeled ILO estimate), (2020)*

*Wage and salaried workers, male (% of male employment) (modeled ILO estimate), (2020)*

*Self-employed, female (% of female employment) (modeled ILO estimate), (2020)*

*Self-employed, male (% of male employment) (modeled ILO estimate), (2020)*

\* WBG, Women, Business and the Law Indicator (2020)

† UNDP, Gender Inequality Index (2018)

‡ WEF, Global Gender Gap Report (2020)

§ UN Women, Global Database on Violence Against Women (accessed on September 22, 2020)

## Gender-Based Violence (GBV)

# Egypt

### COUNTRY CONTEXT

There are two main legislative documents that protect, support, and empower women in Egypt – the Criminal Code of 1937 (and its amendments) and the Egyptian Constitution of 2014.<sup>1</sup>

The Criminal Code of 1937 was modified in 1999 to abolish a provision that allowed rapists to avoid criminal punishment by marrying their victim. In 2011, a Presidential decree increased the penalties under the Criminal Code for multiple offenses against women, including sexual assault, rape, kidnapping, and public sexual harassment. In 2014, a further amendment introduced a minimum six-month sentence for any person who carried out a sexual or obscene gesture, including through the use of modern means of communication. The minimum sentence doubles if the person is found to have engaged in repeated acts of sexual harassment; and further increases if the harassment is proven to have been done with the intent of gaining sexual gratification or through the use of force to receive sexual gratification.<sup>2</sup>

Each year, an estimated 7.8 million Egyptian women suffer some form of violence perpetrated by a partner, family member, someone in their community, or a stranger in a public space.<sup>3, 4</sup> More than one-quarter (26 percent) of ever-married women report having experienced some form physical violence.<sup>5</sup> Battery and assault account for 18 percent of all reported cases of physical violence against women. Murders account for 76 percent. Reasons given for why the violence occurred include honor crimes (42 percent), leaving the home without the permission of the husband (7 percent), and seeking a divorce (3 percent). Husbands are the most common perpetrators. A woman's parents and parents-in-law are also frequently involved.<sup>6</sup>

Globally, Egypt ranks second highest for rates of sexual harassment.<sup>7</sup> In 2013, a government study found that more than 99 percent of Egyptian women and girls surveyed said they had experienced some type of sexual harassment during their lifetime.<sup>8</sup> In this same study, 82 percent of women said they did not feel safe in the street and 86 percent said they did not feel safe when using public transportation.

Female genital mutilation (FGM) is prohibited in Egypt under Article 242 of the Criminal Code. This amendment was introduced in 2016 to strengthen a previous prohibition against FGM that had been introduced in the Child Law of 2008. The practice nevertheless remains widespread. Data from 2014 showed that 87 percent of all women between 15 and 49 years of age had been subjected to FGM. The prevalence rate is lower among younger women – 70 percent among the 15 to 19 age group and 82 percent among the 20 to 24 age group.<sup>9</sup>

### Women's Empowerment

Women in Egypt have lower rates of literacy than men – 65 percent compared to 82 percent.<sup>10</sup> According to the 2017 census,

almost 31 percent of Egyptian females over the age of 10 are illiterate. This compares to almost 19 percent for men of the same age. Illiteracy rates are higher for women in rural areas (39 percent) and higher again in Upper Egypt (45 percent in Minia and 44 percent in Beni Suef).<sup>11</sup>

Women have significantly lower rates of participation in the labor force than men. Only 26 percent of women are engaged in employment. This is approximately five percent higher than at the end of the twentieth century, but still falls a long way behind the participation rate of men at 79 percent.<sup>12</sup> Women are disproportionately represented in the public sector and informal economy – 50 percent of employed women work in the public sector compared with 20 percent of employed men<sup>13</sup>.

Marriage is a major cause of low labor participation for women in Egypt. Many single women abstain from employment because they and their families believe that engaging in paid work could decrease a woman's prospects of getting married. For working women, marriage regularly means an exit from employment due to social expectations about gender roles for married women.<sup>14</sup>

There is a strong bias towards employing men in the private sector. Concerns about security and long working hours pose an obstacle for increased female participation. Working women are also affected by violence. Domestic violence accounts for a loss of half a million working days for employed women; and almost 4 percent of the female workforce suffer violence while at work.<sup>15</sup>

### Benban Solar Park Project Background

Alcazar Energy operates in the Benban Solar Park, which is located approximately 650 km south of Cairo and 40 km north of the city of Aswan. Benban is a US\$4 billion project covering an area of 37.2 sq km.

Construction at the park began in February 2018 and was completed in November 2019. There are 32 plots with 16 different developers. The park is part of Egypt's Feed-in Tariff (FiT) program and is crucial to the country's goal of producing 20 percent renewable energy by 2022. It is currently the third largest photovoltaic solar park in the world and the largest solar plant in the Mediterranean and North Africa region, with the capacity to power approximately one million homes.

At the peak of construction, there were between 8,000 and 10,000 workers on site each day. The majority of the workforce came from Aswan and the surrounding regions.

A Facility Management Company (FMC) is responsible for managing the logistical, environmental, security, health and safety aspects, and community relations of the park. The FMC has developed a Grievance Mechanism Procedure and Stakeholder Engagement Plan to promote a consistent approach to managing worker grievances and community consultations across all the developers.

## Case Study: Alcazar Energy Energy, EGYPT



### PROJECT BACKGROUND

Alcazar Energy was formed in February 2014 as an independent developer and producer of renewable energy (solar and on-shore wind technologies) across the META region (Middle East, Turkey and Africa). The company has developed and operates four 50 MW (AC) photovoltaic plants in the Benban Solar Park - Alcazar Energy Egypt Solar 1 (AEES1), Delta for Renewable Energy, Aten Solar Energy, and Horus Solar Energy. Alcazar selected a joint venture between TSK Electronica and Enviromena Power Systems to be the Engineering, Procurement & Construction (EPC) contractor and the Operations and Maintenance (O&M) contractor for their solar plants. In January 2019, AEES1 was the first solar plant in the second round of the FIT program to achieve commercial operation.

### HOW ALCAZAR WORKS TO PREVENT GENDER-BASED VIOLENCE

In December 2018, the O&M contractor released a General Worker Code of Conduct covering the operations phase of the project. The Code of Conduct applies to everyone working on the project, including direct employees of the O&M contractor and all permanent or temporary personnel hired by the subcontractors.

In January 2019, the company adopted the O&M contractor's grievance mechanism to ensure a smooth transition from the construction to the operational phase of the projects. This mechanism covers both worker- and community-related grievances.

#### General Worker Code of Conduct

The General Worker Code of Conduct is designed to ensure compliance with a range of laws, international standards, and good industry practices; and to mitigate against any risks and negative impacts that may be a consequence of interactions between works and the local population. It includes specific considerations for GBV

and child protection. It explicitly prohibits harassment, GBV, and child exploitation and abuse. It defines harassment as any form of statements, gestures, behaviour, written communication, or language which is abusive, sexually provocative, demeaning or culturally inappropriate. The Code requires employees to:

- consent to a criminal background check;
- treat women and children with respect;
- refrain from using language or engaging in harassing, abusive, and sexually provocative behaviour;
- immediately report concerns or allegations of harassment and GBV;
- attend training courses on GBV and child protection; and,
- not exchange money, employment, goods, or services for sex.

The Code of Conduct also prohibits non-consensual sexual activity with members of communities surrounding the workplace.

After receiving training on the Code of Conduct during the induction process, every worker is expected to sign an 'Individual Gender-Based Violence and Child Protection Code of Conduct' to indicate they understand the policy and agree to comply with its terms. Workers are advised that a failure to comply with the Code of Conduct is considered to be a serious offence and breaches could result in sanctions or termination of employment.

The Code of Conduct has been made available in Arabic, English, and Spanish to accommodate commonly used languages among workers and in communities. Copies are readily available in the control room and offices, and it is also displayed on the Health, Safety, and Environment (HSE) and Social notice boards across all four plots.

Alcazar's Benban site team of five employees is comprised of three men (a Site Manager and two engineers) and two women (a Performance & Monitoring Analyst and a Social Specialist, both from the Aswan region). The two degree-qualified female employees represent 40 percent of the site team. This is a high level of female representation. Across the Solar Park as a whole, the gender ratio is only two percent women.

The O&M contractor team (including subcontractors) does not currently have any women permanently based on site. However, over 25 women were part of the contractor's and subcontractors' teams onsite during construction phase, including trainers, IT specialists, electrical engineers, and project coordinators.



## Case Study: Alcazar Energy Energy, EGYPT

### Worker Grievance Mechanism

The Worker Grievance Mechanism, implemented by the O&M contractor and overseen by Alcazar Energy, has been in place since the early stages of construction. The mechanism provides a platform for receiving, documenting, and addressing complaints promptly, whether received anonymously or not.

The mechanism is available to all direct employees of the O&M contractor and all permanent or temporary personnel employed by subcontractors. It does not seek to prohibit or impede access to external judicial and administrative mechanisms available to workers in Egypt for resolution of disputes.

Workers are encouraged to report grievances verbally in the first instance to their supervisor or manager for resolution. The supervisor or manager is expected to respond within three working days, and to report the incident to the Social Specialist & Human Resources

Manager. If the grievance is not resolved in this way, the complainant can use a grievance form to explain their grievance and desired solution in writing. Copies of these forms are available in Arabic and English. If workers wish to report a grievance anonymously, they can use the collection box to lodge their grievance at any time.

According to the procedure, all grievances are to be acknowledged to the complainant and registered within the project grievance log by the Social Specialist & Human Resources Manager, then screened and evaluated depending on the nature and the level of severity of the complaint. Grievances are to be investigated on a case-by-case basis, identifying the root cause, and proposed actions to resolve the situation, while respecting the confidentiality of the complainant.

If a grievance is not resolved, or if the worker is unsatisfied with the response or action taken, the worker can escalate

the matter through the FMC grievance mechanism. They have three options to do so:

- Contact the FMC Labour Compliance Officer (LCO) in writing
- Submit a non-anonymous FMC grievance form online
- Submit an anonymous FMC grievance form online

In all cases, the FMC LCO attempts to resolve the grievance through consultation with the complainant, the social representatives from both Alcazar Energy and the contractor's teams, the Project Manager, and other department personnel as required.

If the worker is not satisfied with the decision of the LCO, the grievance could then be referred to the FMC Environment, Health & Social Specialist Director for resolution. If the complainant is still unsatisfied with the proposed resolution, they may pursue the matter with external authorities under Egypt's Labour Law.



**"I feel very proud of having been part of Benban Solar Park since mobilization until today when all plants are operational. It is at times challenging for me as a young female to work in such a mega-project, where very few females are employed; and taking into consideration the culture and mentality in Upper Egypt. For some people, whether at the Park or at Benban villages, it may still be shocking to deal with a woman. But I love the challenge of breaking stereotypes and inspiring young girls in the local community."**

**Samaher Hefny, Social Specialist,  
BSc (Agriculture & Natural Resources)**

## Case Study: Alcazar Energy Energy, EGYPT

Under the rules of the Worker Grievance Mechanism, no employee who raises a grievance should be subjected to reprisal or discriminatory acts.

Alcazar Energy maintains the grievance log and continuously monitors the performance of the Worker Grievance Mechanism. The timely resolution of grievances is also measured and assessed on a monthly basis as one of the project's key performance indicators.

### Community Grievance Mechanism

The FMC acts as the single point of contact with local communities for receiving, recording, evaluating, and responding to complaints from members of the local communities. These communities have been informed about the grievance process managed by the FMC. As such, Alcazar Energy would expect any community concerns, issues, or complaints in relation to the Solar Park to be received through the FMC. However, the project-specific

Community Grievance Mechanism also includes consideration for any potential concerns, issues, or complaints received from members of the local communities in relation to Alcazar Energy projects.

Both Alcazar Energy and the O&M contractor have dedicated staff focused on the social and labor aspects and performance of the projects. These staff are responsible for coordination with the FMC Community Liaison Office and providing support with the investigation and resolution of any community grievances related to the project. Alcazar's Social Specialist is responsible for coordinating with the FMC to investigate and resolve any complaint.

Once a grievance is resolved, a grievance closeout form is prepared and signed off by both the FMC and Alcazar representatives, as well as the complainant. This form describes the solution that was implemented to resolve the grievance.

Similar to how the company reviews the Worker Grievance Mechanism, Alcazar

Energy ensures the grievance log and associated documentation are accurately maintained. The company continuously monitors the performance of the Community Grievance Mechanism and evaluate the timely resolution of grievances on a monthly basis as part of their key performance indicators.

### Training Initiatives

A project-specific training plan has been developed and rolled out to ensure everyone on site is knowledgeable about their rights and responsibilities under the Code of Conduct and how the grievance mechanism works. This plan covers the entire project team, including employees, subcontractors, and temporary workers.

Training on the Code of Conduct, and specifically on GBV, is delivered to all workers upon commencement of their employment as a component of the health, safety, environment, and social induction. Regular refresher training sessions are also conducted during toolbox talks.



**"Since the day I joined Alcazar, I have truly enjoyed working in an environment where employees are treated equally, their work appreciated, and their opinions are considered regardless of their background, position, or gender. Being considered as 'just one more' engineer in the team in a male dominated project and industry makes all the difference."**

**Hadeer Mohamed, Site Performance & Monitoring Analyst, BSc (Communication and Electronics Engineering)**

## Case Study: Alcazar Energy Energy, **EGYPT**

Alcazar Energy site members and O&M contractor representatives contributed to a detailed assessment of gender and GBV risks in Benban Solar Park conducted by IFC in 2018. They also attended GBV training arranged by the FMC in November 2019.

As part of its social development and investment program, Alcazar is raising awareness of gender equality with youth from local communities in collaboration with the USAID-funded Workforce Improvement and Skill Enhancement (WISE) project. Teachers and students of the Benban Solar Technical School have received Code of Conduct training delivered by Alcazar Energy's Social Specialist & Human Resources Manager.

**“Across our operations, we endeavor to provide workplaces that are safe, work environments where our employees feel supported, and work relations that encourage communication between employees and management so employees feel comfortable to disclose any issues and seek support from their superiors. We recognize that workplace bullying, and in particular any forms of sexual harassment, could impact business operations, but most importantly could affect the employee’s wellbeing. As such, we ensure adequate policies and procedures are in place that show our commitment, but also provide a systematic approach to respond to any issues. For our four operational solar PV plants in Benban Solar Park, we have together with our O&M contractor developed and adopted a project-specific Code of Conduct that targets any form of sexual harassment and workplace bullying. We promote this Code of Conduct through training across the project team and beyond through, for example, awareness raising for all students from the local communities visiting our plants.”**

**Daniel Lancha, Head of Delivery & Operations**



## Case Study: Alcazar Energy Energy, EGYPT

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- 14 Ibid.
- 15 Ibid.

These case studies were produced by IFC's Environment, Social and Governance Advice and Solutions Department. The content of this publication was developed by IFC Environmental and Social Specialists with support from [Factive Consulting](#). Appreciation is extended to the featured companies for giving us the opportunity to share their approaches to addressing challenging issues and the lessons they have learned.

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