Addressing Gender-Based Violence and Harassment
Good Practice Note for the Private Sector

19 December 2019
Version 6

DRAFT FOR PUBLIC CONSULTATION – CONTENT SHOULD NOT BE TAKEN AS FINAL
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Acknowledgments

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Annex 4: Template for a company GBVH Policy ...............................................................83
Annex 5: Template for a company code of conduct ..........................................................84
Annex 6: Example Key Performance Indicators .................................................................85
Endnotes.................................................................................................................................................. 0
Preamble

1. The responsibility of those operating in the private sector to address gender-based violence and harassment (GBVH) is increasingly being recognised. The global #MeToo movement, which has been evident in countries ranging from India to Brazil, has highlighted how widespread GBVH is. High-profile cases have also drawn attention to the risks of sexual exploitation and abuse when organisations, including companies and investors, interact with communities and service users.

2. At the Safeguarding Summit held in London in 2018, International Financial Institutions (IFIs) reaffirmed their commitment to advance standards, shared best practices and developed guidance on preventing GBVH within their own organisations and through their operations. Further policy commitments and other guidance include:
   - EBRD’s Environmental and Social Policy and Performance Requirements (2020), require its clients to adopt measures to effectively prevent and address any form of violence and harassment, including GBVH.
   - CDC’s Code of Responsible Investing (2017) and Gender Position Statement (2018) incorporate various investment-related requirements to promote equality of opportunity and non-discrimination. This includes a focus on creating a safe and secure working environment that addresses specific needs and risks to women, as well as the development of procedures that provide for workplace cultures of non-discrimination and zero tolerance to harassment. CDC have also strengthened requirements in their legal agreements committing investees to ensure appropriate safeguards are in place with regards to mitigating, and where relevant addressing GBVH risks in their investments and operations. This includes mandatory reporting requirements by investees of any GBVH related incidents.
   - IFC’s Environmental and Social Performance Standards (2012) require investees to address gender risks, non-discrimination/equal opportunity, and health and safety of communities. IFC’s Gender Strategy (2017) includes explicit reference to GBVH and assessing gender risks in IFC investment projects. Materials to guide clients and staff on addressing GBVH in projects were created in 2018 and refined and expanded in 2019. IFC screens and assesses new investment projects for sexual exploitation and abuse and workplace sexual harassment and will require all but the lowest risk clients to include and implement anti-GBVH and gender equality provisions in their human resource policies. During portfolio supervision, IFC will monitor the implementation of mitigation measures to address GBVH risks.

3. This Good Practice Note has been jointly commissioned by CDC, EBRD and IFC and has been developed by Social Development Direct. The Good Practice Note is intended to provide practical guidance for the private sector on how to address GBVH risks in their operations and investments and to respond to reports of GBVH. The guidance is tailored to emerging markets and serves two audiences:
   - staff and consultants working for investors and financial intermediaries who provide finance in emerging markets. This includes banks, funds, private equity firms and others. These audience is generally referred to as ‘investors’ throughout the guidance.
   - staff and consultants working for small, medium and large private sector companies operating in emerging markets. This audience is generally referred to as ‘companies’ throughout the guidance.

4. The Good Practice Note is meant to be relevant across sectors but also highlights some sector-specific risks.
5. Although the guidance included in the Good Practice Note is intended to be relevant to companies and investors across emerging markets, it is important to underline that there is no 'one size fits all' approach to addressing GBVH. Efforts to mitigate GBVH risks and respond to reports need to be grounded in local context. In order to be relevant and effective, the guidance provided in the Good Practice Note may therefore need to be adapted based on the size of a company, the environment in which it is operating and the nature of the work it is delivering.

6. Addressing GBVH risks in the private sector in emerging markets is a relatively new area of work - and an incredibly complex one. In commissioning this Good Practice Note, CDC, EBRD and IFC recognise that it is critical that companies and investors have access to practical guidance on mitigating GBVH risks and responding to reports of GBVH. At the same time, all three organisations also acknowledge that evidence on what works to safely and effectively address GBVH is still emerging. CDC, EBRD and IFC therefore plan to refine and update the guidance in this Good Practice Note as further learning becomes available.

7. CDC, EBRD and IFC also recognise that there is a risk that in response to the guidance included in this Good Practice Note, some companies and investors may go too far to respond to GBVH without having access to the expertise and training which would enable them to do so in a safe and ethical way. Rushed and ill-informed approaches to addressing GBVH could in some cases exacerbate GBVH risks and cause further trauma to survivors. This is especially the case where the right support services are not in place. In response to the risk that further harm could be caused through efforts to address GBVH, throughout this Good Practice Note, companies and investors are alerted to guidance that should be implemented with caution and with the support of a GBVH expert.

BOX 1: What this good practice note does not cover

The Good Practice Note does not directly address violence and harassment which is motivated by factors other than gender, for example religious hatred or disability discrimination. However, GBVH can be compounded by other forms of discrimination and this is acknowledged in the Good Practice Note.

The Good Practice Note does not cover modern slavery and human trafficking. Guidance on these can be found in the following documents:

- **on modern slavery:** Managing Risks Associated with Modern Slavery A Good Practice Note for the Private Sector provides practical guidance designed to support investors and companies in the fight against modern slavery.
- **on human trafficking:** Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking focuses on how financial sector actors can address modern slavery and human trafficking.

Finally, the Good Practice Note does not cover violence against children. Not all violence against children is gender-based but children can be more vulnerable to many forms of gender-based violence. This is acknowledged in the guidance. However, more comprehensive information on violence against children can be found in the following documents:

- **Children, Young People and Work: Guidance for Clients** summarises EBRD’s standards with regard to children and young people in the workplace.
- **Children’s Rights and Business Principles** sets out business actions to respect and support children’s rights.
Navigation Map

To be developed by the designer
# Acronyms

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADB</td>
<td>Asian Development Bank</td>
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<tr>
<td>CBA</td>
<td>Collective Bargaining Agreement</td>
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<td>CDC</td>
<td>CDC Group plc</td>
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<td>CSO</td>
<td>Civil Society Organisation</td>
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<td>DFAT</td>
<td>Department for Foreign Affairs and Trade (Australia)</td>
</tr>
<tr>
<td>DFI</td>
<td>Development Finance Institutions</td>
</tr>
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<td>DHS</td>
<td>Demographic Health Survey</td>
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<td>DRC</td>
<td>Democratic Republic of Congo</td>
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<td>EAP</td>
<td>Employee Assistance Programme</td>
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<td>EBRD</td>
<td>European Bank for Reconstruction and Development</td>
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<td>ENR</td>
<td>Egyptian National Railways</td>
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<td>ESMS</td>
<td>Environment and Social Management Systems</td>
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<td>ESDD</td>
<td>Environmental and Social Due Diligence</td>
</tr>
<tr>
<td>ESIA</td>
<td>Environmental and Social Impact Assessment</td>
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<td>FCS</td>
<td>Fragile and Conflict Affected States</td>
</tr>
<tr>
<td>FWF</td>
<td>Fair Wear Foundation</td>
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<tr>
<td>GBV</td>
<td>Gender Based Violence</td>
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<td>GBVH</td>
<td>Gender Based Violence and Harassment</td>
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<td>GPN</td>
<td>Good Practice Note</td>
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<tr>
<td>HIV/AIDS</td>
<td>Human Immunodeficiency Virus/ Acquired Immune Deficiency Syndrome</td>
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<tr>
<td>HR</td>
<td>Human Resource</td>
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<tr>
<td>IBRD</td>
<td>International Bank for Reconstruction and Development</td>
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<tr>
<td>ICED</td>
<td>DFID Infrastructure and Cities for Economic Development programme</td>
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<tr>
<td>IFC</td>
<td>International Finance Corporation (World Bank Group)</td>
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<td>IFI</td>
<td>International Financial Institution</td>
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<tr>
<td>ILO</td>
<td>International Labour Organization</td>
</tr>
<tr>
<td>KII</td>
<td>Key Informant Interview</td>
</tr>
<tr>
<td>KPI</td>
<td>Key Performance Indicator</td>
</tr>
<tr>
<td>LGBTQI+</td>
<td>Lesbian, Gay, Bisexual, Transgender and other sexual and gender minorities</td>
</tr>
<tr>
<td>NGO</td>
<td>Non-Governmental Organisation</td>
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<td>ODI</td>
<td>Overseas Development Institute</td>
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<td>OHS</td>
<td>Occupational Health and Safety</td>
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<td>PEP</td>
<td>Post-exposure Prophylaxis</td>
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<td>PF</td>
<td>Prosperity Fund</td>
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<td>PR</td>
<td>Performance requirement</td>
</tr>
<tr>
<td>PS</td>
<td>Performance standard</td>
</tr>
<tr>
<td>SEA</td>
<td>Sexual Exploitation and Abuse</td>
</tr>
<tr>
<td>SME</td>
<td>Small-to-Medium Enterprise</td>
</tr>
<tr>
<td>SOBA</td>
<td>Sierra Leone Opportunities for Business Action</td>
</tr>
<tr>
<td>SOGI</td>
<td>Sexual orientation and gender identity</td>
</tr>
<tr>
<td>STI/STD</td>
<td>Sexual Transmitted Infection/ Sexual Transmitted Disease</td>
</tr>
<tr>
<td>TUC</td>
<td>Trades Union Congress</td>
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<tr>
<td>UN</td>
<td>United Nations</td>
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<tr>
<td>UNDP</td>
<td>United Nations Development Programme</td>
</tr>
<tr>
<td>UNGPs</td>
<td>United Nations Guiding Principles</td>
</tr>
<tr>
<td>USD</td>
<td>United Stated Dollars</td>
</tr>
<tr>
<td>VAWG</td>
<td>Violence Against Women and Girls</td>
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<td>WHO</td>
<td>World Health Organisation</td>
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<tr>
<td>WOW</td>
<td>DFID Work and Opportunities for Women programme</td>
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<td>ZEGA</td>
<td>Zambian Farm Employers Association</td>
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<tr>
<td><strong>Glossary</strong></td>
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| **Business partner** | Clients/portfolio companies that receive loans/investments; contractors and suppliers that provide services or goods to companies.  
| **Child** | Any person under the age of 18 years.  
| **Child Labour** | Work that deprives children of their childhood, potential and dignity, and that is harmful to their physical and mental development.  
| **Company** | Private sector organisations, including recipients of an investment from an investor. Also refers here to projects.  
| **Contractor** | A business partner contracted to carry out a service for a company.  
| **Convention** | A general agreement about basic principles or procedures between states.  
| **Domestic Violence** | Any violence between family members and/or current/former intimate partners.  
| **Gender** | The expectations which societies have about the roles, attributes, opportunities and relationships which are associated with masculinity and femininity. These expectations differ from society to society and change over time. In many societies it has been recognised that there are more than two genders. However, ‘men/boys’ and ‘women/girls’ are the dominant and most commonly recognised genders and are therefore used throughout this guidance.  
| **Gender-based Violence and Harassment** | Violence and harassment that it is either directed at people because of their perceived or real sex or gender, or disproportionately affects people of a particular sex or gender.  
| **GBVH risk** | The potential for workers, community members or service users to experience GBVH.  
| **Grievance mechanisms** | Processes that can be used by workers, community members and services users to make complaints or report concerns related to GBVH.  
| **ILO C190** | ILO Convention from 2019 which protects workers and others in the world of work, irrespective of their contractual status and includes those in training, interns and apprentices, workers whose employment has been terminated, volunteers, jobseekers and job applicants, and individuals exercising the authority, duties or responsibilities of an employer. The Convention applies to all sectors, whether private or public, both in the formal and informal economy, and whether in urban or rural areas.  
| **Investor** | Financial actor who provides finance to a private company or other investors. This includes banks, funds, private equity firms and others.  
| **Investment** | An asset or item acquired with the goal of generating income or appreciation.  
| **Intimate Partner Violence** | Behaviour by an intimate partner or former partner that causes physical, sexual or psychological harm.  
| **Migrant worker** | Any person who is moving or has moved across an international border or within a state away from their habitual place of residence to work or seek work, no matter (1) their legal status, (2) whether the movement is voluntary or involuntary, (3) the causes for the movement, or (4) length of stay.  
| **Mitigation** | All actions taken to prevent the negative impact of identified risks.  
| **Non-sexual GBVH** | A person using threatening, bullying, violent or harassing behaviours, which are not explicitly sexual. This can include punching, kicking and shouting as well as denial of resources and psychological abuse.  
| **Operations** | The processes and resources that companies use to produce products or services.  
| **Perpetrator** | A person who commits or threatens to commit GBVH.  
| **Presenteeism** | Workers who are physically at work but are not fully functioning and may not be able to fully perform their duties.  
| **Project** | Coordinated set of activities associated with the provision of a financial product or service.  
| **Report of GBVH** | An allegation, concern or problem that a person or people have related to their or someone else’s treatment.  
| **Safeguarding** | The organisational system to prevent harm or unethical behaviour being perpetrated by individuals.  
| **Services user** | A person who uses infrastructure, service or resources provided by a company, including education or healthcare.  |
| **Subcontractor** | A person or commercial entity contracted to carry out a service by a contractor.  

| **Supplier** | Any business that directly or indirectly provides material goods to a company.  

| **Supply chain** | The chain of suppliers providing materials, components, goods or products for use in companies activities.  

| **Sex** | Biologically stated differences between being male and female.  

| **Sexual exploitation** | A person abusing their position of relative power or trust to exploit someone through sexual relationships.  

| **Sexual abuse** | A person using force or unequal power, for example through sexual assault, rape, attempted rape or forcing someone to perform oral sex. All sexual activity with children is sexual abuse.  

| **Sexual harassment** | A person making unwanted sexual advances, requests for sexual favours or touching or behaving in a way which creates a humiliating or offensive environment.  

| **Survivor** | A person who has experienced GBVH and survived. The terms ‘victim’ and ‘survivor’ are often used interchangeably. ‘Survivor’ is the term generally preferred in the psychological and social support sectors.  

| **Transwoman** | A person who was assigned male at birth but who identifies as female.  

| **Victim** | A person who has experienced GBVH, whether or not they have survived. For those who have survived, ‘victim’ is a term more often used in the legal and medical sectors.  

| **Violence and harassment** | A continuum of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, having the aim of causing physical, psycho-social, or economic harm, including GBVH.  

| **Worker** | A person carrying out activities on, or related to, the activities of a company or their business partner. This includes people employed directly or through third parties such as contractors, subcontractors, labours agencies and suppliers.  

| **Workplace/worksite** | All parts in the boundaries of an investment, project or operation’s physical location or where work is taking place.  


Executive Summary

8. Gender-based violence and harassment (GBVH) occurs in all countries in the world and disproportionately affects women and girls. An estimated 1 in 3 women worldwide have experienced some form of physical or sexual violence by an intimate partner or non-partner.16

9. There is growing recognition among private sector companies and investors that GBVH is a serious global issue with wide reaching implications across workplaces, services and communities. In 2019, the International Labour Organisation (ILO) adopted a new Convention (C190) to combat violence and harassment, including GBVH, in the world of work. The Convention recognises that GBVH is a violation of human rights, a threat to equal opportunities and is incompatible with decent work.17

10. GBVH is an umbrella term used to cover sexual exploitation, abuse and harassment, as well as violence and harassment which is not explicitly sexual. What makes it distinct from other forms of violence and harassment is that it is directed at people because of their sex or gender or affects people of a particular sex or gender disproportionately.18

11. This Good Practice Note provides the private sector in emerging markets with guidance on how to address GBVH risks in their investments, projects and operations. The primary audiences for this guidance are staff and consultants working for investors and those working for companies. The guidance may also have wider interest for those working in government, state-owned enterprises, trade unions, NGOs, and people making investments in public-private partnerships.

12. The Good Practice Note is divided into seven sections covering the various phases of activity for investors and companies in addressing the risks of GBVH and responding to reports of GBVH when they are made.

13. GBVH is distinct from other forms of violence and harassment in that it is perpetrated as a result of unequal power derived from gender inequalities and stereotypes. It can be a one-off act or part of a pattern of behaviour.

14. For investors and companies, it is important to gain a better understanding of the different situations in which GBVH can occur. It is particularly important to understand where company activities are likely to exacerbate GBVH risks.

15. GBVH can occur among workers in a company and its supply chain, between workers and community members or service users, among users of company services or infrastructure, and within families and intimate relationships.

16. Companies and investors can play a significant role in reducing the risk of GBVH, thereby contributing to the improved safety and wellbeing of workers, community members and service users.

17. There are compelling business reasons why the private sector stands to benefit from addressing GBVH, including reputation
management, improved community relations, legal compliance, improved productivity, health and safety, worker retention and access to skills and talent.

18. The following key principles underpin all measures to assess, mitigate, monitor and respond to GBVH in a safe and effective way:

- **Survivor-centred**, prioritising the rights and needs of people who have experienced GBVH and listening to their wishes.
- **Safe and confidential**, protecting people who experience or witness GBVH, as well as the safety of those who identify risks and seek to address GBVH.
- **Context-specific**, basing all actions on a good understanding of the legal and social context.
- **Collaborative approach**, working with internal and external stakeholders to identify and mitigate risks.
- **Inclusive**, addressing the heightened risks of GBVH for certain groups.
- **Integrated**, addressing GBVH as part of an organisation’s existing processes rather than as a separate, one-off exercise.

19. For those who speak out against GBVH, the stakes can be extremely high, and in some cases life-threatening. This is something which companies and investors need to constantly keep in mind.

20. It is important that companies and investors recognise that there is no standard way to respond to all reports of GBVH and that ongoing thought, care and sensitivity is needed. The process of addressing GBVH will often need to be a gradual one. It is far better to take considered action than to rush and risk making things worse – either by inadvertently increasing GBVH risks or by further traumatising those who have already experienced GBVH. Investors also need to recognise this and not put pressure on companies to act immediately. Investors and companies will need to work with individuals and organisations who have GBVH expertise in order to address GBVH in a safe and effective way which is rooted in the realities of the local context.
21. A range of factors can increase GBVH risks. By regularly screening and assessing risks, companies and investors will be better placed to target resources at areas of their operations and investments where GBVH is most likely.

22. The level and nature of GBVH risks will vary based on country and local risk factors such as inequalities between men and women, rigid gender stereotypes, poverty, fragility and conflict, and discrimination against marginalised groups. Certain features of an investment, project or operation can also increase levels of GBVH risk, including aspects of the labour force (for example the recruitment of a large number of new workers and the use of temporary workers), seasonal deadlines, frequent transportation of goods, community engagement in greenfield projects, interaction between workers and service users, the use of security personnel and isolated worksites.

23. It is important to assess company capacity and resources to mitigate GBVH risks and to respond to reports of GBVH. For investors, this assessment can be integrated into existing appraisal processes. For companies, it can be integrated into the design phase of an operation/project or as part of ongoing internal processes.

24. If GBVH risks are high, companies and investors can consider the use GBVH experts to conduct a tailored, in-depth GBVH assessment.

25. Investors and companies can take action to mitigate GBVH risks. It is often easier and more effective to integrate these measures into existing systems rather than create duplicate processes. Guidance on mitigating GBVH risks and preparing to respond to any reports of GBVH is framed around seven key areas of action:

- **strengthening leadership and company culture** so that GBVH is not tolerated and workers feel comfortable and supported to raise concerns. This can include integrating GBVH risks into the company’s risk management system, allocating time for senior management buy-in, establishing a focal point in the top tier of the company’s management structure, tracking progress and improvement, and taking steps to develop a diverse and representative senior management team.

- **developing policies and procedures** that define various forms of GBVH, set out GBVH risk mitigation measures and provide clear codes of conduct linked to company disciplinary procedures.

- **establishing grievance mechanisms and investigations procedures** which enable complaints and concerns related to GBVH to be treated seriously and in an impartial and confidential way. Effective channels for reporting, including an anonymous option, can help encourage workers, service users and communities to report complaints or concerns. Legal advice and GBVH expertise can help
companies understand the scope of national laws and how these may impact upon legal obligations and decision-making.

- **strengthening recruitment procedures and performance assessments** so they address GBVH risks and enable fair and transparent decision-making related to the hiring of staff and awarding of promotions and performance-related pay.

- **delivering training and awareness raising** activities to provide clear messaging about what constitutes GBVH, what behaviours are accepted and tolerated by the company and how to report GBVH-related concerns or complaints. Key to the success of GBVH-related training and awareness raising is tailoring the content, delivery, frequency and duration to the participants (depending on their workplace role and function or if they are service users, community members, and/or partners and family members), as well as the particular GBVH risks associated with a workplace, sector and country context.

- **working with contractors and suppliers** to address GBVH. For contractors, practical entry points include the procurement process (bid documents, evaluation criteria and sharing policies/procedures), contract selection and negotiation, regular engagement, as well as a clear plan for how sub-contractors will be managed. For suppliers, companies can encourage and support their alignment with GBVH risk management practices, agree acceptable codes of conduct, raise awareness about policies and procedures, and include suppliers in any relevant training.

- **Improving the physical design** of worksites and service delivery spaces through safety assessments to identify hotspots for GBVH for different groups of workers, service users and community members. Practical changes can be made to buildings/grounds, access routes, toilets and sanitation facilities, transportation, and workers’ dormitories in order to reduce opportunities for GBVH to be perpetrated.

### Responding to reports of GBVH

26. When a concern or complaint related to GBVH is reported, companies need to respond in a thoughtful and considered way, prioritising the wishes of survivors, witnesses and whistleblowers.

27. For companies, responses can include assigning a lead person who has received training to respond to reports of GBVH, agreeing support services and safety measures for survivors, witnesses and whistleblowers, deciding whether an investigate is wanted and needed, and planning an investigation.

28. Careful consideration is needed to understand the complexities of each individual case, including the level of control and duty of care that a company has in relation to those involved.
29. For investors, it is important to be clear with companies about what is expected in terms of incident reporting, how they want this information to be reported and within what timeframes. Investors also need to consider their capacity to receive, record and track reports. Investors can also ask companies as series of questions about their responses to a report of GBVH to track progress being made. Once a company’s response to a report has been concluded, an investor can work with the company to draw lessons from the process to inform future GBVH risk mitigation and response efforts.

30. Ongoing monitoring provides assurance that GBVH risks are being tracked and companies are taking effective mitigating actions. New GBVH risks may emerge and existing risks can change in severity during delivery of an investment, project or operation. It is therefore important to regularly re-assess GBVH risks.

31. Monitoring can also help investors and companies identify whether any improvements are needed to risks mitigation efforts, grievance mechanisms and response procedures. Key Performance Indicators (KPIs) are a useful way to monitor GBVH risks and the effectiveness of actions to mitigate and respond.
PART A: Understanding GBVH and the business case for addressing it
1 Understanding GBVH

32. **Key outcome:** Understanding what constitutes GBVH and the various forms it can take, its root causes, the circumstances in which it can occur and the business drivers for addressing it.

1.1 Background

33. Gender-based violence and harassment (GBVH) prevents individuals and businesses from reaching their full potential. GBVH has an impact on the physical and mental health of those who experience it and affects their lives and performance at work. As a result, GBVH can also have negative implications for businesses and their investors.

34. GBVH is widespread. It most commonly affects women and girls, with more than one in three women globally having experienced some form of physical or sexual violence in their lives. However, GBVH is not inevitable and can be prevented. A number of international commitments underline the need for urgent and meaningful actions to address GBVH, recognising the vital role of the private sector.

35. In 2019, the International Labour Organisation (ILO) adopted a new Convention (C190) to combat violence and harassment, including GBVH, in the world of work. The Convention recognises that GBVH is a violation of human rights, a threat to equal opportunities and is incompatible with decent work. C190 calls for GBVH risks to be taken into account in the management of occupational health and safety. It also underlines the link between GBVH and the UN Guiding Principles on Business and Human Rights (UNGPs), which were agreed in 2011. The UNGPs emphasise the importance of companies assessing and addressing risks of abuse, paying particular attention to GBVH.

36. By taking steps to address GBVH, companies can support workers’ wellbeing and that of the community members and service users with whom they interact. Acting to address GBVH benefits businesses and investors in a range of ways, including through:

- improved productivity and health and safety.
- increased access to skills and talent.
- improved worker retention.
- stronger relationships with host communities.
- reduced risk of litigation and compensation claims.
- strengthened reputation.

1.2 What is GBVH and why does it happen?

37. GBVH is an umbrella term used to cover sexual exploitation, abuse and harassment, as well as violence and harassment which is not explicitly sexual. GBVH can be a one-off act or part of a pattern of behavior. Although GBVH can take many forms and can affect anyone, what makes it distinct from other forms of violence and harassment is that it is either:

- directed at people because of their perceived or real sex or gender, or
- disproportionately affects people of a particular sex or gender.

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**BOX 2: The difference between sex and gender**

Sex refers to the biologically stated differences between being male and female. Gender refers to the expectations which societies have about the roles, attributes, opportunities and relationships which are associated with masculinity and femininity. These expectations differ from society to society and change over time.
BOX 3: Forms of GBVH

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<th>Forms of GBVH</th>
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<tbody>
<tr>
<td><strong>Physical violence</strong> or the threat of it</td>
</tr>
<tr>
<td><strong>Verbal harassment</strong> such as shouting or insulting</td>
</tr>
<tr>
<td><strong>Non-verbal harassment</strong> such as threatening gestures, staring or sending intimidating or pornographic images</td>
</tr>
<tr>
<td><strong>Financial abuse</strong> such as unfairly withholding or controlling money</td>
</tr>
</tbody>
</table>

**Sexual exploitation**: Where people abuse their positions of relative power or trust to exploit someone through sexual relationships.

**Sexual abuse as a result of force or unequal power**: For example through sexual assault, rape, attempted rape or forcing someone to perform oral sex. All sexual activity with children is sexual abuse.

**Sexual harassment**: Through unwanted sexual advances, requests for sexual favours or touching or behaving in a way which creates a humiliating or offensive environment.

**Non-sexual forms of GBVH using threatening, bullying, violent or harassing behaviours**: This can include punching, kicking and shouting as well as denial of resources and psychological abuse.

BOX 4: GBVH against men

Whether explicitly sexual or not, most GBVH is perpetrated by men against women and girls. However, women can also be perpetrators and men can also experience GBVH. Male on male violence can be particularly prevalent in male dominated spaces, for example in worker camps. Violence and harassment against men is rarely reported due to shame, stigma and misconceptions that men cannot experience sexual violence or harassment. In countries where same-sex sexual acts are illegal, men who report sexual violence by another man risk criminalisation and accusations of engaging in homosexual behaviour.

1.2.1 Gender inequality

38. Gender inequality causes power imbalances which can create opportunities for GBVH to be perpetrated. For example, gender inequality can mean that women struggle to meet their basic needs and those of their families, making them vulnerable to sexual exploitation and abuse. Gender inequality can also mean women lack access to information about their rights and how to seek help if they are experiencing GBVH. This can lead to a lack of reporting which may reduce the deterrent for perpetrators. The use of violence and harassment is also used as a way of maintaining gender inequality.

39. Power imbalances between adults and children can combine with gender inequality to create even greater risks for young people. For example, young and adolescent girls, can have limited access to resources, creating increased risk of sexual exploitation and abuse. Girls may also have less access to knowledge and support services than adult women and are often less likely to be believed if they do report GBVH.

40. Companies and investors may sometimes act to strengthen gender power imbalances and inequality between men and women without being aware of it. For example:
• within companies, male managers and supervisors may be given power over women in lower paid positions. Although this is not always the case, these positions of relative power can create opportunities for sexual harassment and exploitation, as well as non-sexual violence.

• those working for companies and investors can have access to resources or leverage through their roles which put them in positions of power over community members and service users. These positions of relative power can increase the risk of them perpetrating sexual exploitation and abuse.

1.2.2 Gender stereotypes

41. Gender stereotypes set expectations about how men/boys and women/girls should behave. These expectations can cover every aspect of people’s lives, including the types of work they do, the relationships they have and the clothes they wear. Gender stereotypes often set expectations that men should be dominant and physically aggressive, and women should be gentle and subservient to men. These stereotypes reinforce inequality between men and women and can lead to GBVH.

42. Where gender stereotypes are strong, GBVH is often viewed as inevitable. This can reduce the deterrent for potential perpetrators as they do not worry about being negatively judged by others. GBVH can also be used as a way of punishing people who do not conform to gender stereotypes: for example, women who take on jobs which are considered to be ‘men’s work’ and men who dress in a way which is considered to be feminine. This can lead to increased risk of verbal, physical and sexual abuse.

BOX 5: GBVH against people who are LGBTQI+

People who are LGBTQI+ frequently report having experienced violence and harassment based on their sexual orientation or gender identity. In south-eastern Europe, a survey of over 2,300 LGBTQI+ people found that transgender people, men perceived as feminine and lesbians reported the highest rates of negative comments, conduct, and discrimination at work. 41 percent had witnessed negative attitudes, comments and conduct towards LGBTQI+ colleagues and 14 percent had personally experienced these. 64 percent felt the need to hide their sexual orientation and gender identity at work in order to protect themselves.21

1.3 Where GBVH can occur

43. GBVH can occur in a range of circumstances. GBVH is particularly relevant to companies and investors when it takes place in situations over which they have some degree of influence, especially where their operations are likely to contribute to increased GBVH risks. The circumstances where GBVH can occur which are particularly relevant to the private sector are outlined in Figure 1 below.
1.3.1 GBVH among workers in a company and its supply chain

GBVH can be perpetrated within a company, including by company owners, managers, supervisors and co-workers. GBVH can also be perpetrated by those associated or working with a company, for example investors, buyers, contractors and suppliers.

GBVH which takes place within a company and/or within its supply chain is not limited to the physical boundaries of a company’s offices or work sites and can take place in a range of settings, referred to in the ILO Convention C190 as the ‘world of work’ as outlined in the figure below:

- in the workplace, including public and private spaces where these are a place of work
- in places where the worker is paid, takes a rest break or a meal, or uses sanitary, washing and changing facilities
- during work-related trips, travel, training, events or social activities
- through work-related communications, including those enabled by information and communication technologies
- in employer-provided accommodation
- when commuting to and from work
- in recruitment processes

Figure 1: GBVH in private sector investments, projects and operations
Table 1 below provides some examples of GBVH among workers in a company or within its supply chain.

**Table 1: Examples of GBVH among workers within a company or its supply chain**

<table>
<thead>
<tr>
<th>Sexual exploitation</th>
<th>Sexual abuse</th>
<th>Sexual harassment</th>
<th>Non-sexual forms of GBVH</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Supervisors have sexual relationships with workers on the basis that it will guarantee the workers their bonuses</td>
<td>• A colleague forcibly tries to kiss another colleague during a work social event</td>
<td>• A colleague shows other workers pornographic images they don’t want to see</td>
<td>• Supervisors aggressively shout at female workers to get them to work faster</td>
</tr>
<tr>
<td>• A senior member of staff establishes a sexual relationship with an intern on the basis that he will give the intern a good reference and put them in touch with contacts who can give them a job</td>
<td>• A colleague rubs themselves in an unwanted sexual way against a worker when they are visiting a supplier</td>
<td>• Workers make offensive sexual jokes to colleagues</td>
<td>• Managers hit employees when they make mistakes</td>
</tr>
<tr>
<td>• A contractor sexually assaults a company employee during a work-related training event</td>
<td>• A manager always hugs a supplier in a way which makes them feel uncomfortable</td>
<td>• A manager always hugs a supplier in a way which makes them feel uncomfortable</td>
<td>• Co-workers insult a male colleague and call him demeaning names because they think he acts in a feminine way.</td>
</tr>
<tr>
<td>• A colleague shows other workers pornographic images they don’t want to see</td>
<td>• During an interview for a job, a manager passes comments about the interviewee’s clothing and body</td>
<td>• During an interview for a job, a manager passes comments about the interviewee’s clothing and body</td>
<td>• Supervisors routinely refuse workers toilet breaks over lengthy periods of time</td>
</tr>
</tbody>
</table>

**BOX 6: Relevance of toilet breaks to GBVH**

Denying toilet breaks has a detrimental effect on all workers. However, the effect of being denied access to a toilet can have a disproportionately negative impact on women. As a result, it can constitute a form of GBVH. Women can be far more prone to painful – and potentially dangerous – urinary tract infections when they are unable to go to the toilet. For women who menstruate, the inability to use the toilet can be particularly stressful and distressing. Women who are pregnant need to use the toilet more frequently and can be caused pain and distress when they are unable to.

46. Companies may also identify GBVH risks in other companies within their contracting and supply chains. Whereas GBVH risks among contractors can generally be more readily addressed through legal undertakings, a company’s degree of influence and ability to address GBVH risks among suppliers of goods will vary more widely depending on the types of commercial relationships. Nevertheless, companies can seek to understand GBVH risks within both their contracting and supply chains and to use their leverage to enable these risks to be mitigated as far as possible.

### 1.3.2 GBVH between workers and community members

47. GBVH can be perpetrated during interactions between workers and communities, whether those workers come from/reside in local communities, live in separate accommodation or are visiting from other areas. Interactions may take place through company-led processes, for example community engagement exercises, or during or after work, for example at break times or while workers are commuting to and from work. GBVH can be perpetrated either by workers against community members or by community members against workers.

Table 2 below provides examples of GBVH between workers and community members.
Table 2: Examples of GBVH between workers and community members

<table>
<thead>
<tr>
<th>Sexual exploitation</th>
<th>Sexual abuse</th>
<th>Sexual harassment</th>
<th>Non-sexual forms of GBVH</th>
</tr>
</thead>
<tbody>
<tr>
<td>• An employee tells a community member they will receive increased compensation or benefits because they are dating them</td>
<td>• A contractor gropes a community member during a community engagement exercise</td>
<td>• An employee suggests to a community member that they would have better access to support if they had sex with them</td>
<td>• A contractor denies a compensation package to a community member because they are in a same sex relationship</td>
</tr>
<tr>
<td>• A contractor promises someone a job because they have sex with them</td>
<td>• An employee is sexually assaulted by a local community member on their commute home from work</td>
<td>• A contractor sends unwanted sexual pictures to a community member following a consultation exercise</td>
<td>• Community members verbally insult an employee who is conducting a community engagement exercise because they are not dressed in a way which is expected of their gender</td>
</tr>
</tbody>
</table>

1.3.3 GBVH between workers and service users

48. GBVH can be perpetrated during service provision, either by workers against service users or by service users against workers. GBVH involving service users is particularly common in the health, education, transport, leisure, hospitality and tourism sectors, but can also take place in other sectors. Table 3 below provides some examples of GBVH between workers and service users.

Table 3: Examples of GBVH between workers and service users

<table>
<thead>
<tr>
<th>Sexual exploitation</th>
<th>Sexual abuse</th>
<th>Sexual harassment</th>
<th>Non-sexual forms of GBVH</th>
</tr>
</thead>
<tbody>
<tr>
<td>• A teacher establishes a sexual relationship with a student with the promise of better grades</td>
<td>• A hotel guest sexually assaults a worker who is cleaning their room</td>
<td>• A passenger makes unwanted sexual gestures to a train conductor</td>
<td>• A patient shouts verbal abuse at a male nurse because they are in a role usually held by women</td>
</tr>
<tr>
<td></td>
<td>• A doctor gropes a patient while they are treating them</td>
<td>• A healthcare worker offers a shorter waiting time to a patient if they give them a kiss</td>
<td>• A bus driver refuses to drive a man because he is in a same-sex relationship</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• A tutor misuses the personal contact information of a student to text them inappropriate comments</td>
</tr>
</tbody>
</table>
1.3.4 GBVH among users of company services and infrastructure

49. GBVH does not need to directly involve workers for it to be a concern to companies and investors. GBVH can be perpetrated by service users against other service users while they are accessing a company’s infrastructure or services. Table 4 below provides some examples of GBVH among users of company services and infrastructure.

Table 4: Examples of GBVH among users of company services and infrastructure.

<table>
<thead>
<tr>
<th>Sexual exploitation</th>
<th>Sexual abuse</th>
<th>Sexual harassment</th>
<th>Non-sexual forms of GBVH</th>
</tr>
</thead>
<tbody>
<tr>
<td>• A student threatens to publicly reveal another student’s sexuality if they don’t have sex with them</td>
<td>• A patient forcibly trying to kiss another patient while they are staying in hospital</td>
<td>• A passenger makes unwanted sexual comments to another passenger on a bus</td>
<td>• A customer spits at another male customer because they are wearing clothes more often worn by women</td>
</tr>
</tbody>
</table>

1.3.5 GBVH within workers’ families and intimate relationships

50. GBVH does not need to take place at work or in company-controlled spaces for it to have a negative affect on companies and investors. GBVH can be commonplace within families and in current or former intimate relationships. This is known as domestic violence.²²

BOX 7: Why is domestic violence relevant to businesses and investors?

Domestic violence happens in all countries and in a high proportion of families. Domestic violence can include physical and sexual violence, as well as psychological abuse, such as limiting who a partner or family member can see or where they can go. Domestic violence can also involve economic abuse, including controlling a relative’s access to food, health care and employment.

Globally, almost one in three women have experienced some form of physical and/or sexual violence by an intimate partner in their lifetime.²³ In some countries, the figure is far higher. This means that domestic violence is likely to affect some workers of all companies at some point.

Domestic violence is a concern to companies for the following reasons:

• When someone is experiencing domestic violence, it often continues when they get to work. A violent partner may still send them threatening and abusive messages on their phones or by email. They may follow them to their workplace and be violent towards them when they are there. Workers who experience this sort of behaviour may be afraid and embarrassed about how co-workers or their managers might react. It can mean they are distracted from their work and their productivity suffers. Perpetrators of domestic violence can also threaten the security of other workers, particularly if their behaviour is challenged.

• Those who perpetrate domestic violence are often controlling of those they abuse. This can include wanting to make decisions about their work. A perpetrator of domestic violence may decide they don’t want their partner to attend work-related training sessions, to go on work trips or to stay late to do overtime. They may not want them to work at all. This can affect their performance, productivity and skills development. It can also impact on staff retention.

• The physical and emotional effects of domestic violence can impact people’s attendance, performance and safety at work. If an employee has experienced violence by a family member, they may not be able to go to work the following day. They may take time off because they are distressed and if the violence was physical, they may be in pain, ashamed to reveal their injuries or may need to access medical treatment. Even if they come to work, they may not be able to concentrate fully and this can put their own and their colleagues’ safety at risk.

• Changes to employment opportunities can have an impact on families and can threaten established roles. This can sometimes trigger violence. For example, when women gain access to paid work for the first time, men’s status as the main income-earners within families can feel threatened. This can lead to them display more aggressive and violent behaviour in order to
reassert their authority. However, this is not an inevitable outcome of women’s employment and efforts by companies to raise awareness among families about the benefits of women’s paid work can effectively mitigate these risks. See section 5.5 for guidance on raising awareness with partners and family members.

Table 5 below provides some examples of domestic violence affecting workers.

Table 5: Examples of GBVH within families and intimate relationships.

<table>
<thead>
<tr>
<th>Sexual exploitation</th>
<th>Sexual abuse</th>
<th>Sexual harassment</th>
<th>Non-sexual forms of GBVH</th>
</tr>
</thead>
<tbody>
<tr>
<td>An employee’s partner only allows them to eat or have access to household income if they have sex with them</td>
<td>An employee’s relative rapes them</td>
<td>An employee’s former partner sends them unwanted sexual messages while they are at work</td>
<td>An employee’s former partner follows them to work and aggressively shouts at them</td>
</tr>
<tr>
<td>•</td>
<td>•</td>
<td>•</td>
<td>•</td>
</tr>
<tr>
<td>A jealous husband beats his wife because she has been speaking to male colleagues</td>
<td></td>
<td></td>
<td>A jealous husband beats his wife because she has been speaking to male colleagues</td>
</tr>
</tbody>
</table>
2 The Business Case for Addressing GBVH

51. **Key outcome:** Understanding the negative impact which GBVH can have on the wellbeing of individual workers, community members and service users, and the knock-on effects this can have on companies and investors.

52. There is both a strong moral argument and a compelling business case for companies and investors to address GBVH. The impact of GBVH on individuals has a knock-on effect on businesses. This means that a concern for individual health and wellbeing, and business drivers for addressing GBVH are closely related.

2.1 Impact of GBVH on individual health and wellbeing

53. GBVH can negatively impact the wellbeing of individuals who experience and witness it.

Figure 2: Examples of the impact of GBVH on individuals

54. Someone who experiences GBVH which involves physical violence can suffer temporary or long-lasting injuries depending on the severity of attacks. Repeated physical abuse, for example a factory worker who is regularly hit by their supervisor to make them work faster, can also have long-term effects on their physical health. Someone who has experienced sexual exploitation or abuse can suffer physical, sexual and psychological health impacts, including through painful and damaging infections as well as unwanted pregnancies.

55. All forms of GBVH, regardless of how severe they are or whether they are one-off or repeated can have a damaging impact on someone’s mental health. The distress, vulnerability, fear and shame which people can feel can result in depression, anxiety and/or stress. The impacts can be particularly severe when someone has experienced sexual forms of GBVH.

**BOX 8: Links between GBVH and depression**

Women who experience intimate partner violence or workplace violence are far more likely to suffer work-related stress and depression than women who do not. HERRespect Research conducted with 800 female garment workers in Bangladesh found high levels of intimate partner violence (69 percent in the past year) and workplace violence (74 percent in the past month). The research also showed that 40 percent of female garment workers showed signs of depression, compared to an estimated figure of 4 percent among adults in Bangladesh generally. Signs of depression included feeling sad and lonely, having difficulty sleeping, loss of appetite and lack of motivation.

56. Certain forms of GBVH can affect people’s financial wellbeing and ability to meet their basic needs. For example:
   - a worker whose manager withholds their pay or bonuses because they refuse to perform sexual favours.
   - someone who is experiencing domestic violence may be denied access to resources, including their own income.
• workers who are afraid of accepting overtime because of GBVH are not able to maximise their earning potential.

2.2 Impact of GBVH on companies and investors

57. The negative impact of GBVH on individual wellbeing can also impact businesses. Companies and investors who act to mitigate GBVH risks and respond effectively to reports of GBVH can contribute to the improved wellbeing of workers, community members and service users. In-so-doing, they can improve health and safety in their workplaces, strengthen productivity and benefit from improved access to talent and worker retention. Companies and investors can also protect and strengthen their reputation among communities and service users by taking action to mitigate GBVH risks and respond to reports. These efforts can also reduce vulnerability to litigation and compensation claims, and the financial and reputational damage this can inflict on businesses and investments.

58. The risks to companies and investors who do not take action to mitigate GBVH risks and to respond effectively to reports are explained in more detail below.

Productivity and health and safety

59. The physical and mental health effects of GBVH on individuals can have a knock-on effect on how well they perform at work. Risks to businesses include:

- increased absenteeism and presenteeism: A worker who is experiencing GBVH may need to take time off work to recover or attend medical appointments. Workers may also take time off work to avoid someone who is harassing them at work or on the way to and from work. A worker who is experiencing GBVH may be distracted by their pain or emotional distress, which can affect their concentration and result in poorer quality work. Each of these factors can in turn negatively impact on a company's productivity.

BOX 9: In Cambodia, workplace sexual harassment costs the garment sector an estimated US$89 million per year due to turnover, absenteeism and presenteeism. Presenteeism incurs the highest cost, with an estimated 13.5 percent of workers saying that sexual harassment meant they worked less effectively.

BOX 10: GBVH, absenteeism and productivity

In 2019, an IFC study with nine of the largest companies in the Solomon Islands found that bullying and sexual harassment negatively impacted employee health and well-being, including through increased levels of anxiety. These negative impacts led to employees taking time off work and working more slowly. Workers also had reduced concentration, which posed safety risks for themselves and other employees. SolTuna, a tuna processing facility in the Solomon Islands, worked with IFC to implement initiatives to reduce bullying and sexual harassment. For example, it trained a team of first responders in how to handle disclosures of violence at work, strengthened grievance procedures, and implemented a respectful workplace policy to address sexual harassment and bullying. These initiatives have had positive benefits for the company. This includes reducing absenteeism from an average of 18 percent to 15 percent. It is estimated that the company may have gained around $1.58 million USD through increased productivity as a result.

- difficulty securing overtime: A worker who is concerned about GBVH on their commute to or from work may refuse to do overtime if they think opportunities for harassment and abuse are higher after dark or at times when fewer people are around. They may be afraid if transport options are reduced after certain hours, meaning they might have to walk longer distances on their own or travel on isolated trains and buses. A worker may also refuse overtime to protect themselves from having to spend time with someone who is harassing or threatening them at work. Workers’ concerns or fears about working overtime can hinder a company’s ability to resource busy periods and meet the demands of fluctuating workloads and seasonal deadlines.
• **reduced safety**: GBVH is in itself a health and safety issue which puts workers, community members and service users at risk. GBVH represents a danger to those directly affected. In addition, because workers who are experiencing GBVH may be distracted, they may be more likely to cause accidents. GBVH can therefore create wider health and safety risks for all workers, as well as community members and service users.

**BOX 11:** By mitigating GBVH risks and responding appropriately to reports of GBVH, companies and investors can:

- reduce absenteeism and improve workers’ concentration and performance at work, with a positive impact on profits and on returns for investors.
- have a wider positive impact on company culture and the working environment. Workers who feel safer and respected are likely to have higher morale, which can have a positive impact on productivity.

**Access to skills and talent and worker retention**

60. The experience of GBVH – or the fear of it – can affect the decisions people make about where they work, when they work and who they work with. Risks to businesses include:

- **difficulty recruiting new staff**: Experiencing GBVH during a recruitment processes – for example if an interviewer makes sexual jokes or comments – can result in a candidate turning down an offer of employment. Potential applicants may choose not to apply for a post because they have heard rumours that a company tolerates GBVH. Rumours such as these can further restrict companies’ ability to access the skills and talent they need. It can also mean companies have to invest additional resources in further recruitment exercises.

- **Difficulty upskilling and promoting existing staff**: An employee who is experiencing GBVH within a company may choose roles which limit their contact with the perpetrator to protect themselves. For example, they may turn down a promotion to avoid spending more time with a colleague who sexually harasses them or may avoid training sessions if they are spaces where sexually humiliating jokes are told. A worker who is experiencing domestic violence may have their mobility controlled by a relative or partner who forces them to turn down promotions or training opportunities which would require them to interact with new people. As a result, companies can find it difficult to develop skills among existing staff, to promote them into roles they are qualified for and to roll-out new ways of working through training.

- **increased staff turnover**: People who are dealing with the physical and mental health impacts of GBVH may be unable to cope at work and may therefore decide to leave their job. An employee might also decide to leave their job to avoid having to work alongside their harassers, or an employee who is experiencing domestic violence may be forced to leave their job by a controlling partner. As a result, companies can experience increased staff turnover, lose skilled staff, experience disruption to projects and schedules and incur additional costs related to recruitment and training.

**BOX 12:** By mitigating GBVH risks and responding appropriately to reports of GBVH, companies and investors can:

- improve their ability to recruit the skills and talent they need and retain experienced staff.
- develop the skills of their employees and promote the right people, avoiding unnecessary investments in additional recruitment exercises and induction training.

**Litigation, compensation claims and reputation**

61. The negative impact of GBVH on individuals can mean that workers, community members or service users may decide to take legal action against companies and investors and make a claim for compensation. Risks to businesses include:
• **unexpected costs:** Litigation related to GBVH can be time consuming and costly for companies and investors, particularly where they are found to be liable for damages. Depending on the nature of the case and the number of people affected, compensation pay-outs can be high and have a damaging impact on a company’s profits and on returns for those who have invested in them.

• **loss of confidence among investors and other businesses:** Ignoring GBVH risks can damage a company’s reputation. Potential investors, partners and suppliers can become nervous that working with a company which has not sought to understand and address GBVH risks and who is ill-equipped to deal with GBVH reports could increase risks for their own businesses and negatively impact their own reputation.

**BOX 13:** Negative impact of GBVH on businesses

- **In China,** serious reputational damage was done to Didi Chuxing (a popular ride-sharing company) after Didi drivers murdered two female passengers in 2018. The hashtag #DeleteDidi trended on social media, and Chinese authorities ordered Didi to suspend some of its services. The company subsequently invested heavily in improving safety, but reportedly lost $1.6 billion in 2018.\(^{28}\)

- **In the Democratic Republic of Congo (DRC),** research found that ‘beer promotion girls’ hired by Heineken beer company to boost sales were sexually harassed by customers and staff of Bralima, the Congolese subsidiary of Heineken. As a result of an ensuing sexual harassment scandal, several partners suspended cooperation with Heineken, including the Dutch ASN bank who removed all financial involvement.\(^{29}\)

• **damaged relationships with local communities and service users:** Community members and service users may boycott a company, protest, or block their operations if they believe it has disregarded their safety by not acting to mitigate GBVH risks or failing to respond to reports of GBVH effectively. Boycotts and protests can inflict direct operational losses and result in reputational damage, which can affect a company’s profits as well as their ability to recruit locally and deliver projects.

**BOX 14:** By mitigating GBVH risks and responding appropriately to reports of GBVH, companies and investors can:

- reduce the negative impact of GBVH on individuals and in-so-doing, avoid the risk of costly litigation and pay-outs. Well-handled reports of GBVH not only benefit the individuals directly involved but are also less likely to go to court and result in compensation claims.

- improve relations with local communities and strengthen loyalty and trust among service users.

- strengthen confidence among potential investors and partners increasing their access to markets and finance.

**BOX 15:** Legal responsibilities to address GBVH

National legislation related to GBVH varies considerably among countries. According to the World Bank’s database on Women, Business and the Law, 59 countries have no laws on sexual harassment in the workplace. However, many countries do have at least some GBVH legislation in place which is relevant to the private sector.

In some countries, companies can be liable for damages if they have not taken adequate measures to address GBVH and protect their workers, local communities and service users. In terms of sexual harassment at work, around 70 percent of countries will have such laws in place.\(^{30}\) For example:

- **In India** the Sexual Harassment of Women at Workplace Act (2013) carries penalties for employers who do not discharge their responsibilities under the law, including having trained, skilled and competent personnel for handling complaints, defining a time bound complaints process, ensuring confidentiality of information, taking measures to protect individuals from retaliation, offering counselling or other support where needed, and assisting complainants who opts for criminal proceedings.\(^{31}\)
In Greece, law 3896/2010 reversed the burden of proof from the alleged victim to the alleged perpetrator, so that the employer, rather than the employee, has to prove that no sexual harassment took place. This reverse burden of proof does not apply during penal proceedings.\(^{32}\)

In Brazil, law from the Supreme Federal Tribunal has been used to hold employers civilly liable for the acts of employees who physically or sexually harass their colleagues when employers have failed to take protective measures.\(^{33}\)

However, in some countries national labour and employment law can restrict the actions a company or investor can take to respond to reports of GBVH. For example, under some legal frameworks sexual harassment is not considered legitimate grounds for dismissing an employee.

These differences underline the importance of companies and investors understanding the legal frameworks in place in the contexts they are operating and investing in.

It is also important for companies and investors to recognise that they now have legal responsibilities to address all forms of GBVH under the 2019 ILO Convention on Violence and Harassment in the World of Work (C190).\(^{34}\) The Convention sets an international legal standard, which outlines the right of everyone to a world of work free from violence and harassment. Governments which ratify the Convention will need to translate it into national law. In a number of countries this is likely to result in new legislation on GBVH being developed, which companies and investors will need to adhere to.

**BOX 16: DFI Performance Standards and GBVH**

The IFC Performance Standards (PS) have been widely adopted or adapted by other IFIs and also influence how commercial banks and private equity funds make investments. The need to address GBVH is contained within these standards, largely implicitly, but with ever increasing awareness of its importance. The EBRD’s revised Environmental and Social Policy (ESP) and Performance Requirements (PR), operational in 2020, make explicit reference to preventing and addressing GBVH. The two specific Performance Standards/Requirements in which GBVH is especially highlighted are PS/PR2 on Labour and Working Conditions and PS/PR4 on Community Health, Safety and Security, as highlighted below.

**The PS/R2 Labour and Working Conditions require:**

- the employment relationship be based on the principles of decent work, equal opportunity and fair treatment that does not discriminate. Provision should be made for a safe and healthy work environment with measures in place to prevent and address harassment, intimidation and/or exploitation. EBRD’s requirements specifically states that this includes any form of gender-based violence.
- worker accommodation to be provided in a manner consistent with the principles of non-discrimination and equal opportunity; with EBRD making explicit reference to the need to include safeguards against sexual harassment and other forms of GBV.
- an effective grievance mechanism for workers to raise workplace concerns, with EBRD now further emphasising the need for this to include provisions for confidential complaints, and those requiring special protection measures such as reports of gender-based violence.

**PS/R 4 Community Health, Safety and Security require:**

- evaluation of health, safety and security risks and impacts on communities and the establishment of preventative and control measures, with particular attention to vulnerable groups.
- assessment of risks posed by security workers, checking they are not implicated in past abuses and training them in appropriate conduct toward workers and affected communities.
- Investigation of all allegations of unlawful or abusive acts, taking action to prevent recurrence, and reporting to public authorities.
- EBRD further clarifies that the client will assess project-related gender-based violence risks of sexual harassment, sexual exploitation and abuse to project affected persons and communities. Where appropriate, the client will adopt specific measures to prevent and address these risks, including the provision of confidential channels for reporting incidents and providing support.
Further Reading: For information on the business case for addressing GBVH, see the following IFC documents:

- The Business Case for Workplace Responses to Domestic and Sexual Violence in Fiji identifies the impacts of domestic and sexual violence on employers and employees.
- The Impact of Domestic and Sexual Violence on the Workplace in Solomon Islands presents findings from a survey of employees from nine companies looking at how domestic violence affects them at work.
- Respectful Workplaces: Exploring the Costs of Bullying and Sexual Harassment to Businesses in Myanmar outlines findings on the prevalence and cost of bullying and harassment in the agribusiness, finance, retail and tourism sectors.
PART B: Assessing, mitigating, monitoring and responding to GBVH
Figure 3: The process of assessing, mitigating, monitoring and responding to GBVH

Assess (Section 4)

- Undertake screening and assessment in order to:
  - Identify GBVH risks
  - Assess company capacity and resources
  - Conduct an in-depth GBVH assessment when risks are high

Mitigate (Section 5)

- Identify and implement actions related to:
  - Leadership and company culture
  - Policies and procedures
  - Complaints and investigations mechanisms
  - Recruitment and performance assessment
  - Training and awareness raising
  - Working with contractors and suppliers
  - Physical design

Monitor (Section 7)

- Conduct ongoing monitoring of risks and effectiveness through:
  - Key Performance Indicators (KPIs)
  - Collecting and analysing data

Respond (Section 6)
3 Overarching principles

62. **Key outcome:** Understanding the principles which need to underpin all efforts by companies and investors to safely and effectively assess, mitigate and monitor GBVH risks and to respond to reports.

63. All measures to assess, mitigate, monitor and respond to GBVH need to be:

- **survivor-centred**: The rights and needs of people who have experienced GBVH (often referred to as ‘survivors’) should be the priority for companies and investors. When assessing and mitigating GBVH risks, this means considering the trauma which survivors may have experienced or are still experiencing. When responding to reports of GBVH, it means listening and respecting survivors’ wishes and decisions. Prioritising those who have experienced GBVH in this way is known as taking a ‘survivor-centred’ approach. Further guidance on taking a survivor-centred approach is outlined in section 6.

- **safe**: Survivors, witnesses and those who seek to address GBVH can be at risk of retaliation including threatening behaviour and verbal and physical violence. This backlash can be a way of people showing that they do not like the status quo being challenged, or those with power being questioned. Backlash can also be used as a way of trying to silence those who speak out about GBVH. This can mean that people who report GBVH are in an extremely vulnerable position and this can deter people from reporting incidents or raising concerns. It is important that companies and investors act to prioritise the safety of those who have experienced and witnessed GBVH, as well as the safety of other workers, community members and service users. The identity of those who report GBVH or who identify risks during assessment and monitoring activities needs to be strictly confidential.

- **context specific**: Effort to assess, mitigate, monitor and respond to GBVH need to be rooted in an understanding of the local context. Investors and companies are often well-intentioned and keen to act, but there is potential for mitigation and response measures to make a situation worse if the legal and social context is not properly understood or if social support mechanisms, such as counselling and medical care specific to GBVH, are not in place. Companies and investors need to ensure their assessment, mitigation and response protocols are appropriate and realistic given the realities of the local context.

- **collaborative**: Seeking inputs from a range of internal and external stakeholders can increase the likelihood of wider buy-in when raising awareness about GBVH. A collaborative approach can also help improve understanding of GBVH risks and enable ideas to be shared about appropriate measures to mitigate risks. Stakeholders can include workers, business partners, suppliers, and representatives of local communities and service users. Companies and investors can also work with local health and support services or local community-based organisation who work on GBVH in order to draw on necessary expertise.

- **inclusive**: Efforts to mitigate GBVH risks which do not take heightened risks for certain groups into account will at best have reduced impact and at worst could unintentionally cause greater harm. For example, mechanisms for reporting GBVH which are entirely communicated through written information may increase the vulnerability of non-literate women who cannot access them. Groups with heightened risks vary by context, but often include women with disabilities, women working in prostitution, women raising children on their own, migrant or ethnic minority women, and LGBTQI+ groups.
- **integrated:** Addressing GBVH is not a one-off exercise which can be separated from the normal business of companies' and investors’ work. As far as possible, rather than creating separate systems or processes, efforts to assess, mitigate, monitor and respond to GBVH need to be integrated into organisations’ existing processes, such as social management systems and human resources policies and procedures.

**BOX 17: Recognising the stakes are high**

For those who speak out against GBVH, the stakes can be extremely high, and in some cases life-threatening. This is something which companies and investors need to constantly keep in mind.

Responding safely to reports of GBVH can be especially challenging in resource poor settings where support services for survivors may be limited or even non-existent. In these contexts, the risk of further traumatising survivors can be especially high. It is important that companies and investors recognise:

- there is no standard set of responses which will always be appropriate for all reports of GBVH. Ongoing thought, care and sensitivity is needed by companies so that their efforts adapt to the wishes of survivors and avoid causing further harm.
- the process of addressing GBVH will often be a gradual one. Particularly for smaller businesses with limited capacity, it will not be possible – or safe – to adopt a full set of mitigation and response measures all at once. It is far better to take considered action rather than to rush and risk making things worse – either by inadvertently increasing GBVH risks or by further traumatising survivors. Investors also need to recognise this and not put pressure on companies to act immediately.
- investors and companies will need to work with individuals and organisations who have GBVH expertise in order to implement mitigation and response measures in a safe and effective way.
4 Assessing GBVH risks

64. **Key outcome:** Understanding how to screen investments, projects and operations for GBVH risks, to assess company capacity and resources to mitigate GBVH risks and respond to reports, and to know when to seek expert support.

65. The level and nature of GBVH risks will vary based on country context, as well as the type of activities and operations being delivered. Even within a country, GBVH risks can vary from one worksite to another. It is therefore important for investors and companies to understand the specific GBVH risks which apply to individual investments, projects and operations. It is also important that company capacity and resources to mitigate GBVH risks and respond to reports are assessed and the availability of social and medical support services as well as existing community resources are well understood. The elements involved in determining each of these are summarised in Figure 4.

Figure 4: Identifying GBVH risks and assessing company capacity and resources

66. Each of these elements can be integrated in existing company and investor processes early on in an investment or project lifecycle. However, it is never too late and for investments, projects and operations which are already underway. The elements outlined in figure 3 can be undertaken at any point.

**BOX 18: The difference between GBVH risks and GBVH incidents**

It is important to make a distinction between:

- GBVH risks: the possibility that GBVH may be perpetrated
- GBVH reports: specific GBVH incidents or concerns having been raised

Companies and investors need to implement a combination of proactive risk management and reactive incident response.

4.1 Identifying GBVH risks

67. For investors, GBVH risks can be identified as part of wider risk screening at concept/proposal review stage and where needed, assessed in greater depth during appraisal/due diligence. For companies, these efforts can be integrated into scoping and feasibility assessments and design phases. If operations are already underway, as mentioned above, these efforts can be introduced into existing company processes.
4.1.1 Risk factors related to country context

68. GBVH risks tend to be higher in contexts where there are stark inequalities between men and women and where gender stereotypes are rigidly adhered to. A number of other factors related to the country context can also increase GBVH risks. These factors are outlined in Table 6.

Table 6: GBVH risk factors related to country context

<table>
<thead>
<tr>
<th>Risk factor</th>
<th>Why this increases GBVH risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Poverty</td>
<td></td>
</tr>
<tr>
<td>Poverty can mean people:</td>
<td>poverty can make people vulnerable to sexual exploitation due to their needs for services, opportunities and resources. This can include situations where they are applying for a job, trying to enrol in a school or being awarded compensation.</td>
</tr>
<tr>
<td></td>
<td>poverty can also make people more vulnerable to sexual exploitation because they are desperate to keep their jobs, receive their bonus and achieve promotions. This risk can increase where alternative sources of employment or basic services are lacking, and people are entirely dependent on a single company to meet their needs.</td>
</tr>
<tr>
<td></td>
<td>poverty may restrict people’s access to the knowledge and resources they need to report GBVH and seek help and protect themselves. This can reduce reporting and lead to greater impunity for perpetrators.</td>
</tr>
<tr>
<td>Discrimination</td>
<td></td>
</tr>
<tr>
<td>Discrimination varies from context to context but is commonly experienced by people with disabilities, sexual minorities, minority ethnic groups, refugees and migrants and young people. Discrimination can mean people:</td>
<td>people who are excluded from employment opportunities and services can be more vulnerable to sexual harassment and exploitation.</td>
</tr>
<tr>
<td></td>
<td>where decisions are being made about the allocation of livelihoods, compensation and project benefits, this can create situations where marginalised people are at increased risk of sexual exploitation. This is particularly the case in contexts where national legislation precludes certain groups’ formal rights to land or asset ownership.</td>
</tr>
<tr>
<td></td>
<td>stigma and marginalisation can limit people’s access to the information needed to report GBVH and seek support. For example, women who are refugees may not understand grievance mechanisms and information about them may not be available in languages they speak, or in formats they can access.</td>
</tr>
<tr>
<td></td>
<td>refugees, young people and other marginalised groups may be so heavily stigmatised that even if they do report GBVH, they may be less likely to be believed. This can reduce reporting of GBVH, leading to greater impunity among perpetrators.</td>
</tr>
<tr>
<td></td>
<td>GBVH risks can also increase in companies where people from marginalised groups are only represented at the lowest levels of the company structure. This can reinforce power imbalances with other higher paid workers which can enable harassment and abuse.</td>
</tr>
<tr>
<td>Fragility and conflict</td>
<td></td>
</tr>
<tr>
<td>In fragile and conflict affected countries (FCS), people often:</td>
<td>GBVH risks are often higher in FCS, including post conflict, and during and after humanitarian crises. These situations can increase levels of gender inequality, poverty and discrimination, all of which can increase GBVH risks.</td>
</tr>
<tr>
<td></td>
<td>where rule of law is weak and service provision is minimal, people can be left with few options for reporting GBVH or accessing support. This can lead to greater impunity and reduce the deterrent for perpetrators.</td>
</tr>
<tr>
<td></td>
<td>in conflict situations, violence can become viewed as normal and something which comes to be expected. This can include sexual violence, with rape often used as a weapon of war. General levels...</td>
</tr>
</tbody>
</table>
• experience greater levels of discrimination, especially where it is a driver of conflict.
• experience weak rule of law.

of violence, including GBVH to persist even once a conflict has officially ended.
• humanitarian crises and conflict can cause people to become displaced. Being away from their families and communities can enable people to perpetrate GBVH without having to explain their conduct to people they know.
• humanitarian disasters and conflict can be situations when women take on new roles, including employment outside the home. Men may perpetrate GBVH in a backlash against these changes in an effort to re-establish their traditional roles.

4.1.2 Risk factors related to an investment, project or operation

69. Certain features of an investment, project or operation can also affect levels of GBVH risk, alongside those related to country context. These factors are described in Table 7.

Table 7: GBVH risk factors related to investments, projects and operations

<table>
<thead>
<tr>
<th>Aspect of investment, project or operation</th>
<th>Why this factor increases GBVH risks</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Workforce</strong></td>
<td></td>
</tr>
</tbody>
</table>
| Recruitment of a large workforce as well as temporary, informal and migrant labour are common features in several sectors, including agriculture, manufacturing and tourism. These types of labour are also prevalent during construction phases in any sector. | • New income can provide workers with increased status and power. This can create opportunities for workers to sexually exploit community members, especially those who do not have enough money and resources to meet their basic needs.  
• Where migrant workers are away from home, the absence of family and friends can mean there are fewer repercussions for perpetrating violence and harassment.  
• Temporary, informal and migrant workers can also be at increased risk of experiencing GBVH. They may be less likely to report GBVH for fear of losing their jobs and because they are cut off from their support networks. This can increase impunity for perpetrators. |
| In areas with high poverty levels, new job opportunities can mean workers experience a sudden increase in income and access to resources compared to others in the local community. |                                   |
| Labour demand can also create the need for a short-term influx of migrant workers, sometimes living in employer-provided camps. |                                   |
| Workers who have informal and non-standard employment status are frequently excluded from national labour laws, regulations and protections. It is common for these workers to live in fear of losing their jobs. |                                   |
| **Seasonal deadlines**                     |                                   |
| Seasonal deadlines are common in agricultural and manufacturing sectors, particularly in garment and food processing industries. | • Managers and supervisors may use verbal harassment and physical violence as an (ineffective) way of trying to increase workers’ productivity. This can contribute to a general atmosphere in which GBVH is tolerated and less likely to be reported, leading to greater impunity for perpetrators.  
• Companies working to tight seasonal deadlines can also attempt to incentivise productivity through the use of performance-related pay. Whilst this can be an effective way of increasing productivity, the use of bonus schemes and piece-rate systems can be abused and create opportunities for sexual harassment and exploitation. |
| In many sectors, seasonal fluctuations in workload can put companies and their workers under intense pressure to achieve increased productivity in order to deliver on time. |                                   |
| Companies at the lower end of global supply chains can be particularly vulnerable to seasonal pressure, with limited control over deadlines and the fear of losing contracts or be financially penalised if they are not met. |                                   |
| **Transportation of goods**                |                                   |
Frequent transportation of goods is particularly common during **construction phases and in agricultural, forestry, mineral extraction and logistics sectors**.
- Drivers may be required to travel long distances, through isolated communities and overnight.
- Drivers’ income can put them in a position of relative power compared to people in the communities they travel through and stay in.

- The combination of drivers having income and being away from people who know them can create opportunities for them to sexually exploit community members. This can include offering people access to jobs and company resources in exchange for sex. This risk is heightened when communities are isolated and poor.

### Community engagement in greenfield projects

Interaction between workers and community members is particularly common during the planning and construction of large greenfield projects, for example in the **infrastructure and natural resources sectors**.
- Workers may be required to engage with community members in order to consult them on plans for a project. In some cases, for example when land acquisition and resettlement processes are required, this can involve workers having considerable power over the allocation of resources such as compensation and livelihoods restoration.
- Construction projects may require workers to have access to spaces where community members live, work or study during engagement activities or when building ancillary facilities and supporting community infrastructure development.

- Community engagement processes can provide opportunities for workers to sexually exploit community members on the basis that it will improve their access to resources. This risk is heightened where community members are poor or face discrimination, so they are in greater need.
- Workers can also be vulnerable to GBVH perpetrated by community members. Risks can be especially high when workers interact with community members on their own and in isolated situations.

### Service provision

Interaction between workers and service users is particularly common in the **health, education, transport and leisure, hospitality and tourism sectors**.
- In some situations, workers may have considerable power over service users’. This is especially the case where they are providing life-changing services, for example in healthcare and education.
- In contrast, service users may have considerable power over workers, particularly in sectors with wage-based tipping and where there is a strong emphasis on the idea that ‘the customer is always right’.

- Where workers are gatekeepers to services, there is a risk they can abuse their power by sexually harassing and exploiting those who need access to them. This is heightened when service users are in desperate need for services which are in short supply.
- Workers who rely on service users for part of their pay through tips can be at increased risk of sexual harassment and exploitation. This risk can increase where users are paying for high-cost services and companies are keen to please them. This may mean companies encourage workers to tolerate harassment and abuse are less inclined to believe workers who report GBVH.
- GBVH risks are higher where workers or service users are in vulnerable positions, for example patients in hospitals. GBVH risks can also increase when people lack information about how to report incidents and are less likely to be listened to and believed. For example, children in schools and migrant workers in hotels or bars. This leads to greater impunity and reduced deterrent for perpetrators.

### Security personnel

- GBVH risks are higher where workers or service users are in vulnerable positions, for example patients in hospitals. GBVH risks can also increase when people lack information about how to report incidents and are less likely to be listened to and believed. For example, children in schools and migrant workers in hotels or bars. This leads to greater impunity and reduced deterrent for perpetrators.
Even where an investment, project or operation is not in an FCS, public or private security personnel may be required to protect company workers, assets and worksites. This is especially common in infrastructure, mineral extraction and manufacturing sectors.

- Security personnel are often male and can be armed, giving them increased power over others.
- Depending on their role, security personnel may have interactions with workers, community members and service users, with responsibility for overseeing aspects of their behaviour on behalf of a company.
- Although security personnel can offer some protection for workers, including from GBVH, they can also abuse their positions of power and status to perpetrate GBVH, including sexual harassment and abuse. This risk can also increase when they have access to private areas where people sleep, for example employee-provided accommodation.
- Security personnel’s role in policing people’s behaviours can also create opportunities for them to sexually exploit in return for overlooking issues they could report.  

**Isolated locations**

Worksites can be located in remote and isolated areas. This is particularly common in agriculture, forestry, mineral extraction and large-scale infrastructure.

- Remote locations can mean that workers work in isolated situations and/or have to travel long distances to get to and from work.
- In some cases, workers may not be working in remote areas, but may be isolated from alternative sources of employment.
- Remote locations can mean workers are cut off from places to report GBVH and from support services. This can reduce reporting and increase impunity for perpetrators.
- Worksites which are spread out over large areas can create opportunities for GBVH to be perpetrated out of view of others, increasing the risk of physical and sexual abuse. So too can long journeys to and from work through remote areas.
- Workers who lack access to alternative employment options can also be at increased risk of GBVH. They may be highly dependent on a single company for income and be less likely to report GBVH for fear of losing their jobs. This can create greater impunity for perpetrators.

### 4.1.3 Using indicators to determine GBVH risk levels

70. Companies and investors will need to select a set of indicators to help determine the level of GBVH risks for their investments, projects and operations. Annex 1 presents examples of indicators for each of the risk factors outlined in Tables 2 and 3 above, as well as potential sources of information. Companies and investors could select and adapt the example indicators so they are relevant to the local context and the nature of their business. The use of these indicators does not require GBVH expertise. However, those who use the indicators need to have at least a basic understanding of GBVH and knowledge of social and gender-related issues.

#### 4.1.3.1 Country context

71. The indicators for risk factors related to country context which are listed in Annex 1 have been identified based on the data and information which tends to be available in emerging economies. The example indicators cover the following:

- **prevalence of intimate partner violence**, with high levels indicating an elevated risk of other forms of GBVH.
- **gender inequality**, with high levels indicating a high risk of GBVH
- **justification of intimate partner violence**, with widespread justification suggesting GBVH is tolerated and therefore risks are higher.
- **poverty**, with high levels indicating elevated risk of GBV.
- **discrimination**, with high levels indicating elevated GBVH risks.
- **fragility and conflict**, with these categorisations indicating high GBVH risks.
In many countries, the most commonly available data on GBVH relates to intimate partner violence. This is often collected through a country’s demographic health survey (DHS) – a nationally representative household survey conducted in approximately 90 countries every 4-5 years. Intimate partner violence is measured through the DHS by asking ‘ever married women’ a series of questions about behaviours they have experienced in the ‘last 12 months’ and ‘ever’ in their lifetime.

High levels of intimate partner violence can indicate that other forms of GBVH may also be high in a particular country context. The prevalence of intimate partner violence can therefore be used as a proxy indicator for GBVH risks, along with other factors related to country and project context.

However, it is important to keep in mind that figures for the prevalence of intimate partner violence – and any form of GBVH – are likely to be lower than actual levels, because shame, stigma, and fear lead to significant underreporting.

Nevertheless, it can still be useful to use existing data on intimate partner violence, which is available, so long as underreporting is kept in mind.

It is important that efforts to identify GBVH risks do not include any attempts to identify anyone who has experienced or witnessed GBVH, whether community members, workers, or service users. No one should be asked any questions about GBVH or their experiences of it. This is not only unnecessary but is also something which is likely to cause harm by re-traumatising people who have survived or witnessed GBVH.

Instead of - or in addition to - using the type of country-context indicators listed in Annex 1, companies and investors could choose to select an existing ranking to help them identify GBVH risk levels. For example, the Women, Peace and Security (WPS) Index developed by Georgetown University pulls together data from a large number of indicators. The Index captures three dimensions of women’s lives: inclusion, access to justice and security, including data on violence. The Index combines this data to give an overall score for each country which reflects the wellbeing of women. The rankings are updated every two years.

4.1.3.2 Project context

72. Example indicators for risk factors related to an investment, project or operation are also listed in Annex 1. The indicators cover the following:

- **Workforce**, with the need for a large new workforce and/or an influx of temporary or migrant workers indicating an increased risk of GBVH.
- **Seasonal deadlines**, with heavy seasonal fluctuations in workload indicating increased GBVH risk.
- **Transportation of goods**, with transportation over long distances and overnight through remote communities indicating an elevated risk of GBVH.
- **Community engagement**, with interactions with poor communities indicating an increased risk of GBVH.
- **Service provision**, with the delivery of services indicating an elevated risk of GBVH, especially luxury services or highly sought-after basic services.
- **Security personnel**, with the use of security personnel, especially where armed, indicating an increased risk of GBVH.
- **Remote locations**, with worksites in remote locations and/or long isolated journeys to work indicating an elevated risk of GBVH.
4.2 Assessing company capacity and resources to mitigate and respond

73. In addition to identifying GBVH risks, it is important that company capacity and resources to mitigate GBVH risks and to respond to reports are also assessed. For investors, this assessment can be integrated into existing appraisal and due diligence processes. For companies, an assessment of their capacity and resources can be integrated into the design phase of a project or operation, or as part of ongoing internal processes.

4.2.1 Using indicators to assess company capacity and resources

74. Examples of the types of indicators which can be used to assess company capacity and resources related to GBVH are listed in Annex 2. The use of these indicators does not require GBVH expertise, but those using them need to have at least a basic understanding of approaches to mitigating GBVH risks and responding to reports of GBVH. Alongside each indicator, Annex 2 also lists the sources of evidence which companies can use to demonstrate that these capacities and resources are in place. A lack of capacity and resources in any of these areas could increase GBVH risks and mean companies are ill-equipped to respond effectively to reports.

75. The indicators in Annex 2 cover the following (each of which is explained in detail in Section 5 on mitigation):

- Company leadership which actively demonstrates commitment to addressing GBVH.
- Company policies which set out GBVH mitigation and response efforts and codes of conduct, which outline expected behaviours.
- Grievance and investigation mechanisms to encourage and enable GBVH to be reported.
- Recruitment and performance assessment systems which support GBVH risk mitigation.
- Training and awareness raising activities related to GBVH which are routinely delivered.
- Company efforts to encourage and enable contractors and suppliers to align with its GBVH risk mitigation measures and grievance mechanisms.
- GBVH risk mitigation considered in the design of physical spaces.

4.3 Conducting in-depth GBVH assessments

76. An in-depth GBVH assessment may be needed where companies and/or investors have identified:

- potentially high levels of GBVH risks, for example by using the indicators in Annex 1.
- gaps and weaknesses in company capacity and resources to mitigate GBVH risks and respond to reports, for example using the indicators in Annex 2.

4.3.1 Who should conduct in-depth GBVH assessments?

77. In-depth GBVH assessments need to be conducted by GBVH experts. This is both to maximise the effectiveness of the assessments and to ensure they are conducted in a sensitive, safe and ethical way. In order to conduct an in-depth GBVH assessment, an expert should have experience of:

- identifying and assessing GBVH risks, including knowledge of the root causes of GBVH, the forms it can take and the circumstances in which it can occur related to workers, community members and service users.
- assessing and designing approaches to mitigate GBVH risks.
- developing grievance mechanisms for workers, community members and service users.
• responding to reports of GBVH, including those involving children.

78. Although it is helpful, it is not essential that a GBVH expert conducting an in-depth assessment should have prior knowledge of GBVH risks related to a specific industry or sector, or an understanding GBVH risks in relation to a specific country context. However, where the GBVH expert does not have this knowledge themselves, they could be paired with a local expert where possible.

**BOX 22: Tip:** Local or national women’s rights organisations and NGOs working on GBVH can be a potential source of expertise for in-depth GBVH assessments. Working with someone from a local organisation provides the opportunity for a company to establish a source of ongoing support and to strengthen its capacity to address GBVH over the longer term.

Given the complexity of GBVH risks and the relatively new focus on GBVH as a business issue, local experts are likely to need time and support before the in-depth assessment starts in order to familiarise themselves with:
- The sector in which the company works
- Company operations
- Latest approaches to addressing GBVH, both within and beyond the private sector

For large scale investments, projects or operations which face a range of GBVH risks, it can be beneficial to hire an international or regional GBVH expert to work alongside someone from a local organisation. This would enable joint work to conduct the in-depth GBVH assessment and can include an element of mutual learning: upskilling and ongoing mentorship for the local organisation, while the international or regional expert would be significantly assisted with local context.

4.3.2 What can in-depth GBVH assessments cover?

79. In-depth GBVH assessments will need to be tailored to specific investments, projects or operations. In-depth assessments warrant sufficient time so they can be undertaken in a safe, appropriate and thorough way. The timeframe will vary depending on:
- the size, scale and complexity of the investment, project or operation, including the number and location of worksites.
- the size and composition of the workforce and whether there are interactions with community members and service users.
- the nature of GBVH risks in the country context.

80. Once commissioned, the GBVH expert will need to develop a tailored methodology for the in-depth GBVH assessment. The GBVH expert will also need to identify a tailored set of clear procedures to follow if a specific incident of GBVH is identified during the in-depth assessment. This is particularly important because a company may not have grievance mechanisms and response procedures in place.

81. In-depth GBVH assessments provide an opportunity to better understand context specific GBVH risk factors and to tap into local knowledge about support services. In-depth GBVH assessments can also enable investors and companies to learn more about company capacity, systems and resources to mitigate GBVH risks and respond to reports. The methodology for
the in-depth GBVH assessment would ideally include a combination of further desk review of existing information, as well as further information gathering in-country.

BOX 24: Being ready to respond to incidents that come to light

During in-depth assessments, it is important that people are not asked whether they have experienced GBVH. However, people who have experienced or witnessed GBVH may take the opportunity to report these to someone from outside the local area. This means that at any time during in-depth assessments, companies and investors need to be prepared to respond to specific reports which are brought to their attention. For guidance on how to respond to reports, see section 6.

82. Examples of potential methods which could be included in the in-depth GBVH assessment are presented in Table 8.

Table 8: Examples of data collection methods for in-depth GBVH assessments

<table>
<thead>
<tr>
<th>Method</th>
<th>This could include</th>
</tr>
</thead>
</table>
| **Key informant interviews (KIs)** | • company personnel, for example:  
  o owners and significant shareholders  
  o senior managers and supervisors  
  o human resource (HR) staff and community liaison officers  
  o security personnel and those providing worker transportation  
  o worker representatives and trade unions  
  • staff from local women’s rights organisations and organisations representing other marginalised groups, for example disabled people’s organisations.  
  • staff from international and local NGOs working on GBVH.  
  • health workers on site or in local communities.  
  • government department representatives. |
| **Focus group discussions**   | • workers at various levels of the company hierarchy, including interns, apprentices and those on temporary contracts.  
  • community members (various genders and ages).  
  • Service users/user groups. |
| **Observations**              | • location and design of worksites and services, for example isolated and poorly lit spaces.  
  • locations and design of employer-provided worker accommodation and worker transport arrangements.  
  • proximity of worksites to communities.  
  • information on GBVH made visibly available to workers, community members and service users. |

83. The outputs from an in-depth GBVH assessment could include:
- an explanation of GBVH risks for the investment, project or operation.
- a description of company capacity and resources to address GBVH, with an explanation of capacity gaps and weaknesses.
- a detailed set of actions to mitigate GBVH risks (see Section 5 for further guidance on this).
- a detailed set of actions to ensure reports of GBVH are responded to safely and appropriately (see Section 6 for further guidance on this).
- a set of key performance indicators against which to track risks and measure progress (see Section 7 for further guidance on this).
5 Mitigating GBVH risks

84. **Key outcome:** Understanding key areas of GBVH risk mitigation, how they inter-relate, and the importance of an integrated approach.

85. The guidance in this section will need to be tailored to the local contexts in which companies are operating. Mitigation efforts will also need to be proportionate to company size, as well as the scale and complexity of GBVH risks involved. Wherever possible, mitigation efforts will need to be integrated into companies’ existing systems and procedures, rather than creating duplicate processes.

86. The guidance on mitigating GBVH risks is framed around seven key areas:

<table>
<thead>
<tr>
<th>Leadership and company culture</th>
<th>Policies and procedures</th>
<th>Grievance mechanisms and investigation procedures</th>
<th>Recruitment and performance assessment</th>
<th>Training and awareness raising</th>
<th>Work with contractors and suppliers</th>
<th>Physical design</th>
</tr>
</thead>
</table>

(Section 5.1)  (Section 5.2)  (Section 5.3)  (Section 5.4)  (Section 5.5)  (Section 5.6)  (Section 5.7)

**BOX 25: Leverage among investors to encourage and enable action on GBVH**

There are different opportunities for investors to leverage action among companies to address GBVH.

Leverage is generally greatest early on in a commercial relationship. Opportunities for investors to exercise leverage include integrating specific timebound actions into investment agreements via legally binding environmental and social actions plans or gender actions plans. The investment agreement may tie subsequent disbursements to implementation of agreed mitigation actions and requirements to report serious incidents of GBVH up to investors and use key performance indicators (KPIs) (see section 7 for further guidance).

Investors’ leverage can be particularly low in short term investments or projects, or where investments are being made in a single component of a project which is already underway. In these circumstances, it can be helpful for investors to focus on:

- **capacity building** to encourage and enable companies to address GBVH.
- helping to broker **partnerships** between companies and local organisations which work on GBVH. This approach can encourage companies to draw on existing expertise to address GBVH.
- raising GBVH risks in relation to existing priorities, for example **occupational health and safety** (OHS).
- raising GBVH risks in relation to **broader gender risks** and costs to businesses of gender inequality (for example related to non-discrimination and equal opportunities).
- requiring appropriate governance, policies, processes and systems to be in place, including grievance mechanisms and reporting.
- discussing the need for action on GBVH with co-investors so that a consistent set of expectations is presented to the company.

However, one of the most effective ways of encouraging action by companies is to discuss the benefits of addressing GBVH with them. Companies which address GBVH stand to benefit in numerous ways and this is a strong motivating factor (see Section 2 on the business case).
5.1 Leadership and company culture

87. Commitment by senior management to address GBVH helps drive changes to company culture so that GBVH is not tolerated and workers feel comfortable and supported to raise concerns.

88. Practical considerations for strengthening leadership and company culture include:

1. **Understand GBVH risks and how these can be integrated into the risk management system**: In order to mitigate risks, the company’s senior management and Board need to be aware of the potential risks and their role in mitigating GBVH. It can be helpful to assign a Board member with accountability on GBVH.

2. **Build time for senior management buy-in to develop a supportive organisational culture** that takes reports of GBVH seriously and which builds trust in grievance mechanisms. Although efforts are often concentrated early on to get policies and procedures in place, addressing GBVH requires sustained commitment and it can take time to change organisational culture. Some suggestions for the long-term strengthening of organisational leadership and company culture include:
   - **identifying incentives to drive change**, such as reputational incentives (and sanctions). Positive recognition of workers who are making efforts to address GBVH and have adopted good practices, for example through company award schemes or through praise in meetings, can help encourage others to change behaviour.
   - **establishing a focal point** in the top tier of the company’s management structure who is responsible for driving change, as well as other people in the company who can play an important role in mitigating and responding to GBVH. Ideally, the focal point should demonstrate an interest in addressing GBVH and include this role in their scope of work and performance objectives. Examples of activities for a focal point include maintaining an awareness of GBVH company risks; leading communication with workers and external stakeholders, including communities and service users; reviewing company progress; and overseeing company efforts.
   - **tracking progress and improvement**, for example by including explicit sections on GBVH in annual company reports and making GBVH a regular standing agenda item for senior management and Board meetings. Some companies have anti-sexual harassment committees, which could report to the Board. In India, for example, organisations with more than 10 employees are required by law to file an annual report with the number of sexual harassment complaints received, addressed, and cases pending for more than 90 days. Organisations are also required to form an Internal Complaints Committee headed by a ‘female presiding officer’.

3. **Agree how to communicate clear and consistent messages about GBVH**, both internally and externally with communities and service users. Simple, culturally sensitive messages about the behaviours that are expected from workers, sub-contractors and suppliers are most likely to be effective. For example, “we support a safe and harassment-free workplace for all”. The messages can also emphasise the importance of reporting incidents and how to do that. The use of multiple communication methods can help reach non-literate workers and community members, for example staff meetings, newsletters, emails, and posters (see also Section 5.5 on awareness raising).

4. **Identify and establish mutually beneficial partnerships with stakeholders who can provide GBVH support**, including local and national organisations with knowledge and expertise on GBVH and an understanding of local culture and context. In this way, companies can gain long term access to the GBVH-related support and services its
workers, service users and local communities may need, and in return local organisations
can benefit from improved capacity. For example, local organisations can help:

- deliver community awareness raising activities.
- design and deliver company GBVH training.
- provide support to workers and community members who have experienced GBVH, for example through health services, counselling or legal support.
- access and support groups at higher risk of GBVH in a particular context, for example disabled people, children and LGBTQI+ groups.

**BOX 26: Tip:** Identifying organisations to provide GBVH support

When identifying suitable local or national organisations to work with on GBVH and establish mutually beneficial partnerships, key questions to ask can include:

- Which forms of GBVH do they cover?
- What is their track record of working with investors/companies?
- Is there any evidence available on their effectiveness?
- How accessible are their services - do they only work with certain groups?
- Do they have capacity to take on new work?
- Are there any confidentiality considerations?

5. **Take steps to develop a positive and inclusive organisational structure,** with diversity of representation at senior management and board level. Companies with more diverse leadership teams (in terms of gender, race and other characteristics) tend to have a lower risk of GBVH, and particularly sex-based harassment in the workplace (see box below for further reading).40

**Further Reading:** For guidance on promoting diversity and inclusion in the workplace, see:

- EBRD’s Performance Requirement 2 on Non-discrimination and Equal Opportunity
- IFC case study from Pakistan’s HBL Banking and Finance Services on Advancing Gender Diversity through Effective Anti-Harassment Mechanisms
- From IFC, Measure & Improve Your Labor Standards Performance: Performance Standard 2 Handbook for Labor and Working Conditions (from 2010; the Handbook is in the process of being updated)

6. **Take further action: demonstrating leadership beyond the company by addressing GBVH more widely.** Companies who have already taken steps to address GBVH may wish to share their learning with others at a country, sector or industry level. This can involve collaborative efforts with trade unions or other worker groups, with women’s rights organisations and other businesses or business associations. These wider efforts can improve a company’s reputation on GBVH among communities, service users and potential partners and investors.

**BOX 27: Tip:** Building Human Resource (HR) capacity to support leadership efforts

Human resources (HR) departments or functions have an important role in making sure that measures to mitigate GBVH risks are integrated into company processes and management structures. However, HR are sometimes seen as working for management, and therefore may not be trusted by workers. Other roles within an organisation can also play an essential part in mitigating and responding to GBVH risks, including those in management, community relations, safety, and security personnel.

Depending on company size, HR functions are often based with an individual or a team/department in a company, and/or supplemented through external advisory HR support. In many cases, HR
focuses only on payroll. However, there is potential to build the capacity of HR to have a larger role. An effective HR function could help support company leadership to address GBVH by:

- **addressing risks of GBVH in recruitment processes**, including checking that appropriate processes are followed for job applications, interviews, vetting/background checks, contracting, and inductions.
- **developing and/or commissioning training and awareness-raising** activities on GBVH policies and procedures
- **supporting workers who are experiencing GBVH** by signposting them to relevant services and ensuring they are not unfairly disciplined if the violence is affecting their performance at work
- **checking grievance mechanisms and investigation procedures are appropriately followed** and that, where appropriate, are followed up by disciplinary procedures

**BOX 28: Example of building HR capacity to address GBVH and gender equality**

- **Turkey**: EBRD is supporting the electrical distribution and retail firms TREDAS and TREPAS to improve HR practices to address GBVH and gender equality. Starting with a review of HR practices, the companies have rolled out training for over 800 staff on preventing GBVH, as well as a series of actions to improve work-life balance and equal opportunities. The number of women employed in technical roles has increased by 21%. In recognition of the progress made in strengthening gender equality, the HR Director of TREDAS won the ‘Business World Awards’ in 2018.

### 5.2 Policies and code of conduct

89. An essential way for companies to state their commitment to addressing GBVH is through company policies and codes of conduct. Some companies develop a specific GBVH policy while others prefer to address GBVH as part of a wider set of company policies. Both options can be effective but integrating GBVH into existing policies and procedures can send an important message that it is part of normal business.

90. Table 9 below provides tips for developing a comprehensive and effective policy and code of conduct for mitigating the risks of GBVH in all relevant circumstances, including through interactions with communities and service users. GBVH policy and the code of conduct need to be aligned with each other and both need to be clearly communicated to workers so they are understood. The main aspects of the company GBVH policy and code of conduct also need to be communicated to external stakeholders, including community members and service users.

#### Table 9: Tips for developing company GBVH policies and procedures, including codes of conduct

<table>
<thead>
<tr>
<th>Step</th>
<th>Purpose</th>
<th>Recommended tips</th>
</tr>
</thead>
</table>
| 1. Company GBVH policy  
(See GBVH policy template in Annex 4) | Clearly sets out the company’s commitment that GBVH will not be tolerated at work | • **outline the purpose of the policy**, for example that violence and harassment is not acceptable in the workplace (note: some companies may have different policies and procedures for different forms of GBVH—e.g. for example a separate policy specifically for sexual harassment).  
• **clarify definitions and provide examples of prohibited conduct**, e.g. unwelcome sexual advances, propositions or other sexual comments.  
• **cover all workers** regardless of their contractual status, including employees, temporary contractors, interns, volunteers and candidates.  
• **cover relevant external stakeholders**, including communities and service users, as appropriate  
• **describe legal responsibilities** based on national legal frameworks.  
• **signpost relevant procedures**, e.g. grievance mechanisms and investigation procedures. |
• refer to other relevant company policies, e.g. those related to procurement, whistleblowers, health and safety and equal opportunities.
• state support options and safety measures (including protections against retaliation) for those who make a complaint or participate in an investigation.
• briefly note that sanctions apply, e.g. workers who violate the policy are subject to appropriate disciplinary procedures.

2. Code of conduct

| Short user-friendly document, which reflects company GBVH policy | clearly state the unacceptability of all forms of GBVH, with specific examples of behaviours which constitute GBVH |
| Short user-friendly document, which reflects company GBVH policy | briefly outline what settings the code applies in, e.g. in the workplace, travelling to and from work, employer-provided accommodation, communications, and work-related social events, training and travel |
| And provides a set of standards of acceptable conduct and behaviour | cover all relevant circumstances, including interactions with other workers, with those in the supply chain, with community members and with service users. |
| | outline the procedure for reporting breaches of the code |
| | clearly stipulate the consequences of breaching the code, including showing how specific behaviours are illegal under national laws. |
| | ensure the code is signed by all workers, with options that indicate that they have attended training on the code and/or that they have read and understood the code. There should be possibility for workers to request further clarification if required. |

A separate short code of conduct can also be developed for community members or service users, where appropriate, (e.g. a poster at train stations requiring passengers to not sexually harass other passengers and train conductors).

3. Communicate policies and code of conduct

| Raises awareness and understanding of company policies and code of conduct on GBVH | agree target audiences and consider their communication needs, e.g. staff, contractors, truck drivers, security personnel, community members, service users. |
| Raises awareness and understanding of company policies and code of conduct on GBVH | use multiple accessible formats including printed copies, posters, leaflets, electronic links. |
| | translate into local languages and languages spoken by the workforce and local communities. |
| | ensure communication is accessible for non-literate or semi-literate audiences, for example using pictures or verbally through trainings and awareness-raising activities. |
| | provide accessible formats for people with disabilities, e.g. Braille, audio recordings, large print, subtitles. |
| | where appropriate, provide child-friendly and age-appropriate versions, e.g. in schools. |
| | agree frequency of communication, which will vary by according to level of GBVH risk and audience. |
Further Reading: For examples of company policies, procedures and codes of conduct relevant to GBVH, see:

- **IFC Toolkit of Actions and Strategies for Oil, Gas, and Mining Companies** provides samples of: (1) model policy on sexual harassment; (2) model policy on intimate partner violence and GBV; (3) model Code of Conduct for companies, contractors and employees on GBV
- **IFC Tip Sheet: Preventing and Addressing Sexual Harassment in IFC Investment Projects** provides guidance to IFC E&S Specialists, including a model anti-sexual harassment policy
- **World Bank GBV Task Force** aims to strengthen the Bank’s efforts to prevent and respond to GBV risks in World Bank-supported projects.

91. When developing GBVH policies and codes of conduct, companies may wish to **seek input from internal and external stakeholders**. This can be done through existing worker groups, including trade unions, community organisations, and service user groups. Doing this helps to ensure policies and codes of conduct related to GBVH are realistic and relevant to everyone who might need to use them. It can also encourage a greater sense of ownership, so they are more likely to be used.

92. Once policies and codes are in place, ongoing feedback from various groups of workers and stakeholders can help identify how policies and codes are working in practice and whether there is need for change and adaptation.

**BOX 29: Example of developing codes of conduct in a participatory way**
- **Zambia**: The code of conduct for the Zambia Export Growers Association (ZEGA) was developed as part of a collective bargaining agreement between the horticulture industry union and the Zambian Farm Employers Association. As a result of ongoing dialogue, ZEGA added abuse, including sexual abuse to the code, as well as including a grievance mechanism for sexual harassment.

93. In recognition of the damaging impact of domestic violence on employees and their families, as well as the knock-on impact on their work (see Section 1.3.5), some companies are starting to address domestic violence as part of broader policies and procedures. Information on the support that the company will provide to those experiencing domestic violence can be included in the company’s overall GBVH policies or set out in separate company procedures specifically on domestic violence (see example below of Vodafone). Policies might include information on access to emergency leave, changes to worksite locations and/or shift times, financial support with medical costs or legal fees, support accessing services, and practical support to change phone number/email address so perpetrators cannot contact them. Companies might also consider putting in place an employee assistance programme (EAP) to support employees, including those who are experiencing domestic violence.

**BOX 30: Example of assistance for staff experiencing domestic violence**
- **Vodafone**: the multinational telecommunications company introduced a global domestic violence and abuse policy in 2019. The policy gives employees who have faced domestic violence up to 10 days paid leave to seek professional help and counselling. HR managers receive specialist training and have access to a toolkit with practical advice. Vodafone is also rolling out an app, **Bright Sky**, to link those who have experienced GBVH to specialist local support services.

### 5.3 Grievance mechanisms and investigation procedures

94. GBVH is widely underreported. Having accessible grievance mechanisms in place can encourage workers, service users and communities to report incidents or raise concerns about GBVH. Companies will also need to develop investigation procedures so that they are able to respond to reports once they are made.
95. It is important that people both inside and outside a company have access to effective channels through which they can report GBVH, including options to report anonymously. Grievance mechanisms will need to be tailored to the needs of different groups of workers, communities and service users, which is likely to mean that multiple reporting channels are necessary.

**BOX 31: Making sure certain community members aren’t excluded**
When allocating responsibilities for community relations, including identifying community liaison officers from within local communities (e.g. for community grievance mechanisms), it is important to consider local power dynamics and establish reporting options which are accessible to everyone within the community.

96. All reporting channels need to be safe and emphasise the importance of maintaining confidentiality. Examples of reporting channels include:

- **channels for workers**, such as independent helplines, email address or whistleblowing lines, trade union representatives, health and safety committees, raising concerns with supervisors, and/or formal complaints to HR. It is important that at least one of the channels have the option for anonymity.

- **channels for service users and communities**, such as the company’s or contractor’s community grievance mechanism, complaint/feedback boxes, a free telephone number, a designated community organisation or service user group, or a local women’s organisation. Reporting channels also need to include anonymous and child-friendly options to encourage children and young people to come forward.

97. For all reporting channels, the person making the report will need to receive an acknowledgement that it has been received, as well as information about next steps and support services and safety measures available.

**Further Reading:** For guidance on developing grievance mechanisms which are accessible to children, see:

- UNICEF’s [Child-friendly Complaint Mechanisms](#) provides detailed guidance on what makes a reporting mechanism child-friendly, key principles and elements, as well as common challenges and how to overcome them.

**BOX 32: Example of independent grievance mechanisms**

- **Bangladesh:** The Accord is a legally binding agreement between global brands and retailers and trade unions to improve safety in the garment and textile industry. The Accord provides workers with an independent grievance mechanism through which they can confidentially raise concerns, including around workplace violence, and be protected against retaliation.44

- **Lesotho:** an independent grievance mechanism has been created to tackle sexual harassment in textile factories, funded by USAID and implemented by Solidarity Center. The independent oversight body has the power to investigate claims and compel factories to discipline offenders, including through dismissal.45

**BOX 33: Adapting to the needs and wishes of survivors**

The most important aspect of GBVH grievance mechanisms and investigation procedures is that they need to be focused on the safety and wellbeing of survivors. Whilst it is important that companies and investors plan ahead to prepare for potential reports, they will need to be flexible in order to respond to the wishes of GBVH survivors.

98. Below are some considerations for creating safe, accessible and effective grievance mechanisms and investigations procedures for GBVH. Companies will need to tailor their approaches, so they are relevant to the context in which they are working and the nature of
their business. Some companies may prefer to update existing grievance mechanisms and investigation procedures, so they address GBVH, rather than creating new ones.

Table 10: Things to consider for GBVH grievance mechanisms and investigation procedures

<table>
<thead>
<tr>
<th>Design of new mechanisms or Update of existing mechanisms to integrate GBVH</th>
<th>Grievance mechanisms</th>
<th>Investigation procedures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design reporting channels relevant to the GBVH risks identified and to the different groups, including communities and service users.</td>
<td>Agree how the organisation will respond to reports including how to decide whether to formally investigate.</td>
<td></td>
</tr>
<tr>
<td>Consider which groups may wish to report and what is accessible for them. A 'one size fits all' approach is unlikely to be effective.</td>
<td>Define an approach to investigations before it is required. Develop an investigation procedure that is clearly documented and appropriate to the breadth of GBVH reports which might be made. Procedures will need to be flexible to adapt to the wishes of survivors.</td>
<td></td>
</tr>
<tr>
<td>Design accessible and culturally appropriate ways to report, e.g. tailored to specific languages, taking account of cultural sensitivities, and people with special needs.</td>
<td>Clearly state in procedures how confidentiality must be ensured throughout different stages of an investigation. E.g. guidance on restricting the number of hard copy reports that are produced and the number of people copied into emails. Make it clear that breaches of confidentiality link to company disciplinary procedures.</td>
<td></td>
</tr>
<tr>
<td>Include information for survivors about available support services and safety measures</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plan for how the organisation will protect confidentiality, including offering anonymous reporting. Ensuring confidentiality is a central consideration at all stages.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Implementation</th>
<th>Prioritise or take a phased approach if necessary. Consider the greatest GBVH risks and which groups may be most vulnerable to these. Establish accessible mechanisms in these areas first if resources are constrained.</th>
<th>Ensure that appropriate resources are available to implement investigation procedure set out by the company. Recognise any constraints and plan for how these could be overcome.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Communicate that people have a right to report a concern and how to make a report. Communicate clearly and repeat the message. Plan for how this communication will be managed and monitored across all operations.</td>
<td>Recognise the limits of the company’s in-house capacity to handle investigations and define where input from others must be sought, e.g. investigators, local NGOs, GBVH experts, child protection experts.</td>
<td></td>
</tr>
<tr>
<td>Keep complainants regularly updated, including the expected timeframes and provide prompt responses to any questions.</td>
<td>Identify a pool of individuals with diverse characteristics responsible for carrying out investigations. Third-party services may need to be procured.</td>
<td></td>
</tr>
<tr>
<td>Provide information on available support and safety measures, including through worker representatives, trade unions and local organisations. (whilst maintaining confidentiality).</td>
<td>Roll out comprehensive mandatory training for designated investigators, delivered by GBVH experts.</td>
<td></td>
</tr>
<tr>
<td>Identify a pool of individuals with diverse characteristics (e.g. male and female, management and worker</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
representatives) responsible for leading the company’s response to reports.

**Roll out mandatory training and provide guidance for all those who might receive a report.** Equip employees with guidance relevant to their role in responding to report.

<table>
<thead>
<tr>
<th>Learning and review</th>
<th>Review all related policies and procedures so that they work together. E.g. policies for reporting, disciplinary action, whistleblowing, code of conduct etc</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Publish data on complaints and investigations in a confidential way that does not reveal the identity of the parties involved, e.g. including the number of incident reports in Annual Reports.</td>
</tr>
<tr>
<td></td>
<td>Seek input from others where appropriate, e.g. trade union representatives, people working for local NGOs, GBV experts</td>
</tr>
</tbody>
</table>

99. **Companies will need to seek legal advice and GBVH expertise** when designing grievance mechanisms and investigation procedures, as it is important to understand the scope of national legal frameworks and how these may impact upon legal obligations and decision-making. Questions to consider include:

- To what extent are company procedures survivor-centred and adaptable to the needs and wishes of individual survivors, which may differ from person to person?
- Do company procedures meet the minimum legal requirements for dealing with reports, discipline and dismissals in the workplace?
- Are national laws understood so it is clear when a behaviour might constitute a crime?
- How will the company’s grievance mechanisms and investigation procedures adopt a balanced and robust approach between believing complainants while also ensuring due process and discouraging false reporting?
- What are the practical considerations about timeframes for filing a complaint? Ideally there should be no limit on the timeframe – this will ensure that cases of GBVH dating back over many years can still be heard.
- Is it clear what specialist skills may be needed? For example, GBVH expertise, child protection expertise, or those with specific knowledge or the needs of certain groups, for example those with a disability?
- Have you identified local organisations and worker representatives who can support survivors? this could include health services, psychosocial support and legal advice.

**BOX 34: Encouraging concerns to be raised**

Some workers, community members and service users can worry that grievance mechanisms are only designed to report the most severe forms of GBVH. As a result, people can feel discouraged from using a grievance mechanism to report behaviours which make them feel uncomfortable. It is important that workers, community members and service users know that they can also use grievance mechanisms to report concerns about less severe forms of GBVH.

100. Despite formal grievance mechanisms, it is possible that any workers could receive a report of GBVH. All workers will therefore need to receive guidance on how to receive a report,
with clear instructions on what to do next, the limit of their role in this situation and their responsibilities in promptly referring on a report.

101. **Technology and digital tools** are increasingly used to report GBVH concerns. There is some evidence that digital grievance mechanisms are particularly well suited to younger users. Organisations need to carefully consider both the risks and opportunities of digital tools, as outlined in the table below. Using technology and digital tools still require an organisation to have robust procedures for responding to reports i.e. what happens next.

Table 11: opportunities and risks of using digital reporting for GBVH

<table>
<thead>
<tr>
<th>Opportunities</th>
<th>Risks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Some users may be more comfortable with reporting via technology</td>
<td>Poor design may mean that follow-up or investigations are challenging e.g. not enough information gathered</td>
</tr>
<tr>
<td>Greater anonymity than a phone call which requires that no-one is near to overhear</td>
<td>Fears about data confidentiality may put people off using digital channels</td>
</tr>
<tr>
<td>Facilitates an instant, accessible and central audit trail and case management system.</td>
<td>Companies may be concerned about high levels of demand and whether they have the resources to respond adequately</td>
</tr>
<tr>
<td>Easier to track and report GBVH that crosses borders</td>
<td>Some digital tools are expensive and may require ongoing external IT and administrative support</td>
</tr>
<tr>
<td></td>
<td>Digital tools may be less accessible if there are issues related to language, literacy and access to technology</td>
</tr>
</tbody>
</table>

**BOX 35: Examples of digital tools**

- **EthicsPoint™** is a confidential online and phone-based reporting system used by several organisations. Anyone with concerns about abuse or misconduct in the workplace can file an anonymous report.
- **MySafeWorkplace®** is a secure third-party reporting system used by several brands and companies. People can report concerns about GBVH or other ethical violations by phone or online.

5.4 **Recruitment and performance assessment**

102. Recruitment and performance processes provide an important opportunity to mitigate the risks of GBVH. Practical considerations for integrating GBVH prevention into recruitment and performance assessments for workers irrespective of their contractual status, including volunteers, interns and apprentices are outlined in Table 12 below.

Table 12: Integrating GBVH prevention into recruitment and performance assessments

<table>
<thead>
<tr>
<th>Stage</th>
<th>Things to consider</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application process</td>
<td><strong>include clear statement in job advert</strong> that the company does not tolerate GBVH in any of its operations.</td>
</tr>
<tr>
<td></td>
<td><strong>mention if the role requires a criminal record check</strong> so that candidates can report any behaviours about which they may be concerned, or not apply.</td>
</tr>
<tr>
<td></td>
<td><strong>a self-disclosure form</strong> allows candidates to tell the company in confidence about any investigations, disciplinary procedures or criminal convictions – these forms need to be in sealed envelopes and only opened if candidates accept a job offer.</td>
</tr>
<tr>
<td></td>
<td><strong>discuss with third party recruitment agencies</strong> whether they might be (unwittingly or willingly) engaging in GBVH</td>
</tr>
</tbody>
</table>
### Interview
- **written recruitment procedures** outlining decision making based on clear criteria.
- **Candidates aware of expected behaviours** of interviewers and how to report any behaviours about which they may be concerned.
- **interview panel** with at least two people.
- **value-based questions** can be a good way of assessing candidates’ understanding about acceptable workplace behaviour.

### Vetting checks
- **at least two references**, including one from a candidate’s most recent employer.
- **checking a candidate’s identity**, e.g. their passport/ID papers at interview.
- **criminal records checks** can help to identify any previous convictions, however these are limited in many countries.
- **follow up on any concerns**, seeking advice from HR or legal experts.

### Contracting
- **GBVH stated as a disciplinary offense in all contracts** for employees and contractors, including links to company policies, procedures, code of conduct.
- **all workers to have written contracts**, including temporary workers to reduce concerns that they may lose their job if they report GBVH.

### Inductions
- **training or induction sessions on relevant GBVH policies, code of conduct and grievance mechanisms**.
- **all new workers should read and sign the code of conduct**
- **a short probation/trial period** (e.g. 3-6 months) can help concerns to be raised and appropriate action taken.

### Performance appraisals
- **positive recognition** of efforts to address GBVH through praise or company award systems.
- **staff with responsibility for addressing GBVH** have it included in their scope of work/objectives and appraisals.
- **reduce opportunities for sexual exploitation in bonus and other forms of employee reward schemes** (e.g. at least two people making the decision, clear set of criteria, visible procedures)

## 5.5 Training and awareness raising

103. Training and awareness raising activities provide opportunities for employees and external stakeholders to receive clear messaging from a company’s leadership that GBVH is not tolerated, learn more about what constitutes GBVH and promote discussions that can lead to an improved workplace culture. They can also help those inside and outside the company to understand the policies and procedures and code of conduct which a company has in place in relation to GBVH, which can both discourage perpetration and encourage reporting.

### 5.5.1 Internal training sessions?
104. There are different training options for managers, supervisors and workers on GBVH, ranging from short one-off online trainings focused on communicating basic information about GBVH policies and codes of conducts to more intensive courses designed to transform attitudes and behaviours. Caution should be exercised with shorter more basic courses as there is some evidence that this type of training often has little impact. 47

105. The most effective training on GBVH is likely to be tailored and proportionate to the particular GBVH risks associated with an investment, project or operation, as well as the sector and country context. Frequency and duration of GBVH training will also vary according to...
various factors (e.g. level of GBVH risks, staff turnover). Below are some recommendations for suggested training content and format.

Table 13: suggested content and format of GBVH training

<table>
<thead>
<tr>
<th>Training for workers needs to be tailored to role and function, but may include some of the following key elements and content:</th>
</tr>
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<tbody>
<tr>
<td><strong>Format</strong></td>
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</table>
| • interactive, participatory training techniques with opportunities for smaller group work can help encourage self-reflection and space for discussion about gender and beliefs that support or tolerate GBVH.  
• smaller groups of maximum 25 people (and ideally 10-20 people).  
• delivered by a trainer with GBVH expertise.  
• training can be standalone and/or incorporated into other training modules (e.g. wider Occupational Health and Safety trainings).  |
| **Suggested content** |
| • what is GBVH, including clearly explaining its impact.  
• what causes GBVH, including discussion of gender inequality and stereotypes, (allowing time for participants to discuss and reflect upon these concepts)  
• what is the company’s policy and code of conduct related to GBVH? Clearly outline behaviours that are not tolerated, why this policy has been introduced and what are the rights and responsibilities of workers/supervisors/managers and others.  
• what are the company grievance mechanisms and investigation procedures? How can workers report any concerns?  
• what support services and safety measures are available for workers experiencing and reporting GBVH?  |
| **Practical tips** |
| • keep a list of attendees to ensure the training reaches all workers and contractors (including contractors, truck drivers and security personnel).  
• feedback forms can help check that participants have understood the training and identify how to improve future sessions.  
• check workers have signed copies of company GBVH policy and code of conduct to show they understand and will adhere to them.  
• check training materials are suitable for attendees, e.g. in accessible format for semi-literate/non-literate workers, migrant workers, and workers with visual/hearing impairments  |
| **More specialist training for staff responsible for handling reports, carrying out investigations and providing support to survivors** |
| **Additional content** |
| As above, plus more in-depth training on:  
• detail on roles and responsibilities of managers, supervisors and staff responsible for receiving and investigating reports  
• comprehensive training on company grievance mechanisms and investigation procedures with scenarios and group exercises (e.g. role plays) to ensure staff are prepared to respond effectively to reports.  
• understanding how the risks of GBVH can be exacerbated by various factors (e.g. seasonal deadlines, temporary workers)  
• Thorough understanding of a survivor-centred approach and the importance of confidentiality.  
• Comprehensive understanding of local support services available to survivors and witnesses.  
• Knowledge of GBVH, legal and child protection expertise available to the company.  |
Further reading:

- **Terms of Reference for Sexual Harassment Training** – developed by IFC when recruiting an expert consultant to conduct training (see Tool 4.5)
- **ILO/IFC Better Work** offers a series of tailored training courses ranging from one hour to 6 days on preventing harassment, occupational safety and health, communication and supervisory skills
- **HERRespect Curricula** is an intensive GBVH training approach used in garment factories in Bangladesh to promote positive gender relations, encourage self-reflection and prevent violence in the workplace and family. It includes an 18-hr curriculum for managers, male and female workers, plus 3 joint activities for managers and workers (90 minutes each)

5.5.2 Awareness raising with service users and communities

106. Raising awareness among community members and service users on what behaviours they should expect from workers, but also what is expected of them in terms of interactions with each other (as service users) and with workers, can help to reduce GBVH risks. Clear messaging about mechanisms to report GBVH and how reports will be handled is also important.

107. Awareness-raising can form an important component of a broader strategy to reduce the risks of GBVH, but it is not often effective as a single strategy. Activities need to be targeted and accessible to the audience, for example meetings with service user groups, community leaders and NGOs, posters in project host communities and spaces where services are provided, and events linked to international campaigns (e.g. the 16 Days of Activism against Gender-Based Violence from 25 November to 10 December).

**BOX 36: Examples of awareness raising with service users (transport sector):**

- **Georgia**: Drivers for the Tbilisi Transport Company (an EBRD client) wore orange badges to show their support for survivors of GBVH as part of the Orange the World campaign in 2018.
- **Egypt**: Egyptian National Railways (an EBRD client) has conducted a series of awareness-raising activities to improve passenger safety and prevent GBVH. Examples include a public awareness campaign on train travellers and behaviour, fines for inappropriate behaviour which is communicated via message boards on trains and platforms, information boards showing locations of complaints offices and reminding passengers of surveillance cameras on trains and platforms. ENR have also trained security personnel on preventing sexual harassment in trains and stations.
- **Brazil**: In Rio, several major transport stations established centres offering legal, medical, and counselling support to those affected by GBVH as well as 107 electronic information terminals to raise awareness.

Examples of awareness-raising with communities:

- **Malawi**: Traditional leaders have played a key role in preventing GBVH from the influx of labour associated with rural road projects, according to an IBRD/World Bank study. In some communities, traditional leaders have raised awareness about incoming workers beginning temporary sexual relationships with local women, including the risks of sexual violence, disease and pregnancy.
- **Bangladesh**: A project with garment workers in Dhaka trained male and female workers to be peer educators and advocates who challenge GBVH. The peer educators engage with the wider community through sessions organised in workers’ cafes. The project also engaged in community-based campaigns and factory-wide training.

5.5.3 Awareness raising with workers’ partners and family members

108. Where company operations provide women with economic opportunities for the first time and where there are traditional views about women not working outside the home, companies could consider delivering targeted awareness raising activities to women’s partners and family members, for example inviting them to staff inductions. This can help to address any concerns
and emphasise the benefits to help prevent potential increases in domestic violence in the early stages of women’s paid employment.

**BOX 37: Example of awareness raising with male partners to prevent GBVH against employees:**
- **Sierra Leone:** The Sierra Leone Opportunities for Business Action (SOBA) is a UK government-funded agribusiness programme which put in place a range of low-cost initiatives to mitigate the risk of its female employees experiencing violence from their husbands and partners. Initial research found increased tension between women staffing newly established rice kiosks and their male partners. In response, employees’ partners (with the consent of employees) were included in staff inductions to counter misperceptions about the nature of the job. Survivors of violence were also referred for professional counselling support through a specialised local organisation that also facilitated a conversation on domestic violence during staff induction.  

**BOX 38: Tip:** Emphasise positive behaviours and everybody standing up to GBVH
Some of the most effective training and awareness raising activities emphasise positive collective action against GBVH and challenge harmful stereotypes, while also being careful not to alienate men as potential allies. Although GBVH training might outline certain precautions to avoid GBVH, training that focuses too much on how not to place oneself at risk may inadvertently reinforce victim-blaming attitudes. Instead, group-based participatory training can encourage workers to look out for colleagues’ well-being and to report GBVH when they witness it.

### 5.6 Working with contractors and suppliers

109. An important way to address GBVH is by working collaboratively with contractors and suppliers. Collaboration can happen through formal processes to ensure GBVH requirements are reflected in procurement processes and contracts. Companies are likely to have greater leverage to achieve this early on in a commercial relationship. Companies can also adopt more informal efforts to raise awareness and share information with contractors and suppliers.

110. It should be highlighted, however that whilst contractors and suppliers may go through similar processes, the relationship with contractors and suppliers has some important differences. The relationship with contractors especially for large scale projects is often managed through contractor management plans that cascade investors’ requirements of companies to contractors and therefore make it easier to manage risks. Table 14 provides some practical entry points for working with contractors.

**Table 14: practical entry points for working with contractors on GBVH**

<table>
<thead>
<tr>
<th>Stage</th>
<th>Potential entry points</th>
</tr>
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<tbody>
<tr>
<td><strong>Procurement process</strong></td>
<td>• <strong>bid documents</strong> that include information about GBVH risks and expectations, including early tender notices, Terms of Reference, requests for proposal and bidding instructions</td>
</tr>
<tr>
<td></td>
<td>• <strong>evaluation criteria</strong> that reflects GBVH requirements, e.g. the proposed approach to mitigating GBVH risks, the bidder’s code of conduct, and whether they have had any contract terminated or suspended due to previous GBVH incidents</td>
</tr>
<tr>
<td></td>
<td>• <strong>request for bidders to share GBVH policies and procedures</strong> where these are in place, and to adhere to the company’s own GBVH policy/procedures where these are not in place</td>
</tr>
<tr>
<td></td>
<td>• <strong>clearly set out realistic costs</strong> relating to mitigating GBVH risks (e.g. for training, engaging service providers) and labour disaggregated reporting broken down by direct, casual, contracted labour</td>
</tr>
<tr>
<td><strong>Contract selection and negotiation</strong></td>
<td>• <strong>clauses in contracts</strong> committing contractors to adhere to company GBVH policy and procedures. This can include specific GBVH risks and agreed measures to address them</td>
</tr>
</tbody>
</table>
**Reporting requirements** in relation to GBVH. This can include the use of KPIs in relation to mitigating the risks of GBVH

**Additional safeguards** for projects that are at higher risk of GBVH

**Regular engagement**

- **Sharing information** about GBVH risks including changes in laws, business risks, examples of good practice or information about local GBVH organisations who they could consider partnering with

- **Including contractors in company training** on GBVH

- **Integration of GBVH issues into contractor control management tools.** Include a review of GBVH risks when monitoring contractor performance

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### BOX 39: Example of addressing GBVH in contracts

- **Nepal and road maintenance**: A UK-funded project has been working with industry partners, including the Contractors’ Association of Nepal, to implement gender-sensitive requirements into standard road maintenance contracts. This has resulted in the successful adoption of a sub-clause under ‘Non-discrimination and Equal Opportunities’ that requires contractors to implement GBVH preventative measures: *“The Contractor shall provide gender and inclusion orientation to its work force. The orientation may be done through an external expert and should focus on enabling a working situation for gender and eliminating gender harassment and violence. Similarly, the Contractor’s gender and inclusion orientation shall include human trafficking, STI/STD and preventive measures to be taken by all workers.”*\(^56\)

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### 111. How to manage GBVH risks along a supply chain?

Companies can:

1. **Map where GBVH risks are highest in their supply chains.** How do their own business operations impact on GBVH among their contractors and suppliers – and across their supply chains more widely? For example, tight delivery times and last-minute changes to orders can put intense pressure on suppliers and their workers. This can increase the likelihood of supervisors and managers using verbal aggression and physical violence to increase productivity. Companies can discuss these issues with their suppliers to identify and agree ways to relieve production pressure. This can include giving longer lead in times and encouraging non-violent ways of encouraging productivity among workers, such as clear communication about what is expected from workers, financial and reputational rewards.

2. **Map GBVH risks against their levels of influence** – companies may have greater leverage with primary suppliers (i.e. tier one, core suppliers). Companies can encourage and support primary suppliers to align with the expected GBVH risk management practices, for example agreeing an acceptable code of conduct, raising awareness about policies and procedures, and including suppliers in any relevant training. Companies may also wish to monitor implementation of GBVH prevention and response through spot checks and/or a 3\(^{rd}\) party monitoring of their primary suppliers (see Section 6). In the absence of leverage or supplier willingness to engage, they may be able to reorient their supply chain overtime to reduce risks and increase their level of influence.

3. **Scope possibilities to form partnerships with others to increase leverage and address risks in the supply chain.** Companies may also have opportunities for wider influence and sharing their learning on understanding, assessing, mitigating, responding and monitoring GBVH risks. Where a company’s leverage is low, for example where it represents a very small share of a suppliers’ business, collaboration with others can be helpful in increasing pressure on suppliers to address GBVH. This can include: companies who also want to address GBVH; trade unions, NGOs or local organisations (e.g. service user groups or community groups); sector or industry bodies. (see box on taking further action).
BOX 40: Taking further action: examples of company-worker agreements to address GBVH

Enforceable agreements between brands, suppliers and their workers are a pioneering new model, whereby brands use their economic power to require suppliers to adhere to standards around GBVH and other labour standards. The agreements often include an independent office with the power to investigate worker complaints and impose punishments on abusive managers and supervisors, including dismissal. Examples include:

- **The agricultural sector in the United States:** In 2011, the Coalition of Immokalee Workers launched the *Fair Food Program* to address GBVH and human trafficking in supply chains. This innovative model is based on a partnership between farmworkers, fruit/vegetable growers, and retail buyers. The programme has been widely recognised for its worker-driven, market-enforced approach.57

- **The garment sector in Lesotho:** A landmark agreement for a *worker-led programme to address sexual harassment and abuse in the garment sector* links key apparel brands (Levi Strauss & Co, The Children’s Place, and Kontoor Brands) with the supplier (Nien Hsing Textile Company). The enforceable agreement in 2019 follows years of advocacy by a coalition of labour unions and women’s rights advocates.58

5.7 Physical design

112. An important way to address GBVH is to integrate GBVH into company safety assessments in the workplace, including service delivery and infrastructure. Risks can be exacerbated by poorly designed or maintained physical spaces, such as dim lighting, broken locks, isolated facilities and inadequate supervision.

113. **Safety audits** are a useful tool for identifying and assessing physical safety issues with workers, service users and community members. Safety audits could help identify hotspots for violence and harassment such as toilets, corridors, workers’ dormitories, at access routes in/out of the worksites, and during commutes. Audits should also take into account perceptions of safety for different groups of workers, service users and community members.

114. For some sectors or communities, these hotspots may be quite specific, such as truck drivers’ rest stops. Hotspots such as these require targeted awareness raising.

BOX 41: Example of safety audits

- **SafetiPin app** is a gender-sensitive safety audit which collects information about how safe people feel in different locations. ADB used the app in the design of the Hanoi Metro system59 to reduce GBVH on Vietnam’s first metro line. Companies can also use SafetiPin to improve safety for employees outside the workplace, including global positioning system (GPS) tracking and alerting users to possible dangers.60

Table 15: Assessing GBVH risks: an illustrative checklist

| Location, grounds and access routes | • Building/grounds in a location perceived to be safe by the local community  
| • Well-maintained lighting in and around grounds and access routes  
| • Security equipment (e.g. CCTV cameras)  
| • Personal alarms for workers in isolated locations or situations |
| Water, Sanitation and Hygiene (WASH) facilities | • Separate, lockable doors for toilets  
| • Toilets conveniently located and easily accessible  
| • WASH facilities are well-lit  
| • Provision of hygienic and safe sanitation disposal facilities |
| Transportation | • Safe transport provided to and from worksite  
| • Safe walking to and from, and waiting at transport facilities (including public transport stops) |
| Workers’ accommodation | • Living facilities located within a reasonable distance from the worksite  
| | • Separate sleeping areas for men and women (except in family accommodation), with lockable doors and windows  
| | • Separate beds for each worker  
| | • Separate, lockable sanitary facilities located within the same buildings  
| | • Measures in place to avoid overcrowding and lack of privacy |

Further reading:
- **EBRD Performance Requirements**, including on Labour and Working Conditions (PR2) and Health and Safety (PR4)
- **IFC Performance Standards**, including on Labor and Working Conditions (PS2) and Community Health, Safety and Security
- **Violence against Women and Girls, Infrastructure and Cities Briefing Note** provides a framework for integrating GBVH into all urban and infrastructure programming. Developed by the Infrastructure for Cities and Economic Development (ICED). See also **Sexual Exploitation, Abuse and Harassment in Infrastructure tool** and ICED note on integrating GBVH into **Transport**
6 Responding to reports of GBVH

115. Key outcome: Understanding the steps companies and investors should take when handling GBVH reports, including how to ensure protection and support for survivors, witnesses and whistleblowers, when to investigate and how to escalate.

**BOX 42: Implementing a survivor-centred approach**

In section 3 of this Good Practice Note, a survivor-centred approach was identified as an overarching principle to guide all work to address GBVH. This principle is especially important when it comes to responding to reports of GBVH. Key elements of a survivor-centred approach are to:

- **Treat survivors with dignity and respect**, taking time to listen to what they have to say rather than rushing to take action.
- **Enable survivors to make informed decisions** about what they want, providing them with information about support options available.
- **Help survivors to feel safe**, including maintaining confidentiality so their information is not shared.
- **Treat all survivors in an equal and non-judgmental way**, making sure people’s experiences are not unfairly dismissed, for example because they are young, disabled or work in prostitution.

6.1 Company responses to reports of GBVH

Diagram to be developed by the designer

116. It is important that companies respond thoughtfully to reports of GBVH. Responses that are provided by trained individuals who prioritise the safety and support needs of survivors, witnesses and whistleblowers reinforce the message that GBVH is not tolerated.

**BOX 43: Taking time to respond appropriately**

Responding poorly to reports of GBVH can undermine the credibility of a company’s effort to address GBVH more widely and may cause further harm to those involved. Companies need to be prepared to respond to reports when rolling-out grievance mechanisms and investigation procedures (see section 6). It is important that when a report is made, companies avoid rushing to act in an impulsive or ill-thought-through way and instead take the time to respond effectively, drawing on GBVH and child protection expertise whenever needed. It is important that investors also recognise the need for companies to take their time to respond safely and appropriately to reports of GBVH, and do not pressure companies to rush their responses to reports.

117. The extent to which a company is able to take action on a report of GBVH will vary depending on the level of control and duty of care they have in relation to those involved. It is important to note that there is no standard way of categorising reports of GBVH and no fixed way of responding to every report. Companies will need to carefully consider and navigate a range of complexities. Examples of these complexities are presented in the section that follows.

118. Sometimes, a complaint may not be about a specific incident. Workers, community members, service users and others may hear rumours, or witness behaviour that concerns them, but may not be sure if there has been an actual incident of GBVH. These types of concerns still need to be treated as potential complaints which may require investigation.

6.1.1 Assigning a lead person

119. As soon as a report of GBVH is received, a company will need to assign someone to lead their response. This lead person is responsible for supervising the case from start to closure, including overseeing:
• the offer of support options to those involved.
• efforts to maintain confidentiality and a survivor-centred approach throughout.
• initial decisions on how to proceed with a report of GBVH.
• any investigations that take place.
• decisions that are made following an investigation.
• all internal and external communication related to the report and follow up to it, providing necessary updates to those involved throughout the process.

120. It is important that the lead person has already received training on how to respond to reports of GBVH and have developed the skills and confidence to take a survivor-centred approach (see section 6). Ideally, the lead will be drawn from a pre-existing pool of trained individuals. The person who is identified to lead the company’s response should be without actual or potential conflicts of interest or bias relating to the report that has been made. Smaller companies with more limited resources could at least have several individuals to draw upon, from within the company or could opt to work with partners or third parties to provide this role.

BOX 44: Involvement of Third-Party Providers
Using third-party providers can strengthen the impartiality of those dealing directly with reports. If choosing this route, companies could select a service that covers all types of GBVH-related complaints. Choosing a comprehensive service reduces the risk of exposing the nature of the complaint being made to others in the organisation, which can be especially important for small organisations. However, companies can also choose a more specialised service depending on the risks related to their operations.

121. The lead person will need to make sure that the report of GBVH is appropriately and securely logged on the company’s internal system and that records are kept during the process of responding to the report. It is crucial that confidentiality is maintained throughout in order to protect survivors, witnesses, whistleblowers and alleged perpetrators.

6.1.2 Providing immediate support options and monitoring needs

122. Once an appropriate person has been identified to lead the company’s response to a report of GBVH, their immediate priority is to identify support options which can be offered to survivors and others involved, such as witnesses and whistleblowers. The lead person will also need to identify and present safety measures which protect them from further harm.

BOX 46: Recognising that support needs change over time
Identifying the support and safety needs of survivors, witnesses and whistleblowers is not a one-off act. Instead, companies, and the person identified to lead their response, will need to monitor support and safety needs on an ongoing basis. This is likely to require multiple conversations with survivors, witnesses and/or whistleblowers.

123. It is important that support options and safety measures identified by companies are:
• independent from any other action taken in response to the report of GBVH.
• proactively offered, as opposed to made available if requested.
presented in a way that gives survivors choice and control so they can make informed decisions in confidential spaces where concerns can be discussed.

• provided by trained staff so as not to cause further harm to survivors, and to ensure support is centred around their needs.

124. Support services can be provided directly through the company or via referrals. In-line with a survivor-centred approach, survivors, witnesses and whistleblowers need to be able to choose what support they access. It is important that companies respect these choices, even if it means that people do not want to access any form of support. Additional support may increase the uptake of services. For example, companies could provide survivors with someone to accompany them whilst accessing services.

**Box 47: Examples of the types of support options which companies might identify:**

- **Medical support:** for incidents involving sexual violence this may include the following treatment, which need to be administered within 72 hours after the incident to be effective:
  - Emergency contraception to prevent unwanted pregnancies;
  - Post-exposure prophylaxis (PEP) treatment which reduces the likelihood of HIV infection after potential exposure.

- **Psycho-social support** for survivors and witnesses. For sexual violence or harassment this may need to include trauma counselling.

- **Legal advice** for survivors, whistleblowers, witnesses and alleged perpetrators, as necessary

- **Financial support,** including paid leave for survivors and witnesses;

- **Measures that support reintegration into the workforce** e.g. career/guidance counselling or professional mentorship

- **Child protection support services** and/or expertise for reports involving children.

**Box 48: Example of providing workers with access to independent counselling and legal services**

- **Jordan:** In 2014, a multi-purpose centre for workers was established at the Al-Hassan Industrial Zone. The centre provides a safe space for workers to seek legal advice and counselling after incidents of sexual harassment in the garment industry. It is estimated that around 80% of the 17,000 workers employed in Al-Hassan factories are migrants from India, Sri Lanka and Bangladesh. The centre also provides training, healthcare and opportunities to socialise.

**Box 49: Facing the challenge of a lack of local services**

In some contexts, companies will be operating in environments where there is a lack of support services. Companies may be faced with the challenge of having identified the need for a particular type of support for a survivor but without such services being available locally. In these situations, companies could seek to identify international organisations who are operating in the local context and who might be able to provide or facilitate access to support. Companies could also seek to secure relevant expertise from outside the local context.

6.1.3 Deciding whether to investigate

125. Not all reports of GBVH will require a formal investigation process. The decision about whether or not to investigate should be determined not only by the severity of a report but ultimately by the wishes of the survivor. Even if a survivor decides they do not want an investigation to be conducted, a company can still take steps to strengthen its communications, policies and procedures to mitigate further GBVH risks.

**Box 50: Respecting the wishes of survivors**

It is possible that a survivor, even after raising an initial complaint may decide that they do not wish to proceed with an investigation. This could be for a number of reasons including:

- Embarrassment and shame at having to describe what has happened
- Fear they will lose their job, face stigmatisation or experience other forms of retaliation
• Distress and trauma, which means they don’t want to re-live what they have experienced
• Lack of trust that the process will be handled fairly and in confidence
• Previous bad experiences of raising complaints
However, the need to prioritise the wishes of survivors can cause a dilemma for companies and investors when a survivor does not want a report to be investigated but other workers, community members and service users may be at risk from an alleged perpetrator. Going against the wishes of the survivor could put them at risk of harm but not investigating may mean that others are at risk. This scenario can be extremely complex, and it is important that when faced with this situation, companies identify as quickly as possible a GBVH expert who can provide tailored advice, which reflects the legal context and specifics of the case. Where a report involves a child, a child protection expert will need to be identified.

126. If the survivor does want to proceed to investigation, then the company, and the person leading its response, will need to determine the following:
• is there sufficient information to constitute a complaint?
• does this reported behaviour constitute a potential breach of company policy?
• is there an identified survivor or victim and alleged perpetrator?
• is further information required to determine whether or not the complaint can be upheld.

127. If the survivor does not want to proceed to an investigation, then the company can still continue to provide support to them.

BOX 5: Taking a non-judgemental approach
The following factors do not decrease the severity of an incident or credibility of a report:
• a delay in reporting. Individuals may delay reporting because of fear of backlash, not knowing or trusting the company policy, fear of being blamed for causing the GBVH, not understanding it was GBVH or needing to overcome the initial trauma of it;
• the fact that a relationship was at one time consensual does not diminish credibility nor is it a defence against a subsequent charge of sexual harassment, exploitation or abuse;
• clothing, appearance or flirtatious behaviour does not provoke sexual harassment or abuse and does not give anyone permission to touch or make sexual remarks;
• sexual orientation of the survivor does not mean they have provoked GBVH or that the impact of GBVH is any less severe;
• the survivor having worked or currently working in prostitution or engaging in transactional sex does not mean that they have provoked GBVH or in any way deserve it.

128. If the reported behaviour is illegal the survivor may want to report the case to the local authorities. Where a case has been reported to the local authorities, companies will need to decide whether to proceed with their own internal investigation. If there is a possibility that the internal process could compromise the criminal investigation or cause further harm to the survivor (for example by being interviewed twice), it should not go ahead. Where this is the case, the company can still provide support and safety measures for the survivor, as long as this remains independent from the criminal investigation. When reported behaviour potentially involves a criminal act, it is advisable that companies take legal advice.

BOX 52: Survivors views on reporting to the authorities
In some contexts, survivors may be concerned that reporting an incident of GBVH to the local authorities could put them or the alleged perpetrator at risk of harm. For example, with a report of sexual harassment, if the survivor is a married woman in a country where extramarital relations are illegal, there is a high risk of honour killings. With a report of sexual exploitation, if the survivor and perpetrator are the same sex and homosexuality is illegal, they could face corporal punishment, including the death penalty.
6.1.4 Planning and conducting an investigation

129. When an investigation does go ahead, the person leading the company’s response will need to inform the alleged perpetrator that there is an allegation against them. If they are staff, a volunteer or contractor of the company, they may need to be suspended while an investigation takes place. When making a decision about whether or not to suspend an alleged perpetrator during an investigation, a company could consider:

- **the severity of the alleged incident and/or whether allowing the alleged perpetrator to stay on would put others at potential risk or be at risk themselves.** If this is the case, the alleged perpetrator could be suspended to protect others. The grievance mechanism should clearly set out this protocol.
- **whether suspending the alleged perpetrator would expose the identity of the survivor or put them at risk of retaliation.** Other protection measures could include redistributing workers (assigning the alleged perpetrator a role with limited and/or supervised interface with workers, community members or service users), restricting movements of the alleged perpetrator (for example limiting work-related travel).

130. Before a report of GBVH is received, companies should already have clear investigation procedures in place. These should set out how reports will be investigated, by whom and within which timeframes (see section 5.3 for further guidance on this).

![Box 53: Maintaining confidentiality at all times](image)

It is essential that all details about the investigation and the interviews that are conducted are kept confidential. The identities of everyone involved in the investigation, including the investigator themselves will need to be protected. In order to maintain this, companies can:

- limit the number of people with whom information about the investigation is shared;
- give thought to the timing and location of investigation activities, including interviews so they are away from worksites and not observed by others;
- file all paper and electronic information about the investigation in secure locations;
- consider whether those involved in the investigation could sign a confidentiality agreement; Link failure to maintain confidentiality to company disciplinary procedures and making this clear to all staff.

131. When a report of GBVH is going to be investigated, the person leading the company’s response will need to:

- **develop terms of reference** for the investigation team, identifying any specialist skills needed in addition to GBVH expertise, for example in child protection if the report involves someone under the age of 18.
- **oversee selection and commissioning of a qualified investigator who has GBVH expertise.** If this expertise is not available locally, then a national, regional or international expert may need to be identified.
- **put measures in place to protect everyone involved in the investigation,** not only the survivor and witnesses, but also the investigators themselves.
- **continue to provide support** to survivors and witnesses throughout the investigation, and beyond, if needed.
- **keep the survivor and other parties involved regularly updated** on progress of the investigation. The lead will need to decide what information is appropriate to share without compromising confidentiality or the investigation process.
- **receive the investigation report and decide how to proceed** based on the conclusions of the investigation report. If the complaint is upheld, decisions will need to be guided by the company’s disciplinary procedures. If the investigation team is unable to conclude whether the complaint is upheld, further follow up may be required.
- **communicate the outcome of the investigation to all relevant parties,** ensuring that confidentiality is still maintained.
• file any records of the investigation so they are confidential. Complaints that were not upheld will need to be stored separately from an individual’s personnel files.

BOX 54: Encouraging survivors to feel safe and comfortable during an investigation

The company’s lead will need to consider how the selection of the investigator/composition of the investigation team can encourage the survivor and any witnesses to feel comfortable when they are being interviewed. Companies can ask survivors and witnesses if they would prefer an investigator who has certain characteristics, for example if they would prefer them to be a woman.

132. Once, commissioned, those investigating reports of GBVH are usually responsible for:
• undertaking a risk assessment and making any recommendations on safety and confidentiality.
• planning the investigation including establishing substantive questions that the investigation will seek to answer.
• making recommendations on the work status of the alleged perpetrator during the investigation.
• gathering and securing evidence, including conducting interviews
• concluding an investigation finding based on the evidence gathered
• preparing and submitting an investigation report which includes a record of all steps taken.
• making recommendations on adjustments to policies, procedures and communication that may help prevent this form of GBVH from occurring again.

133. Following an investigation, the person leading the company’s response could seek to draw lessons from the case, considering whether:
• any adjustments are needed to grievance and investigation mechanisms.
• any changes need to be made to company policies and procedures.
• additional support services need to be identified in response to future reports.
• additional external expertise needs to be identified in case of future reports, for example legal expertise.
• further mitigation efforts are required, for example additional trainings, communications or awareness raising activities for workers, community members and service users.

6.2 Investor responses to reports of GBVH

134. Investors have an interest in knowing what GBVH is taking place in their investments and whether these are managed and investigated in an appropriate manner as this poses a reputational and financial risk to them.

6.2.1 Agreeing what needs to be escalated

135. Investors will need to decide what information about GBVH reports and investigations they expect companies to report to them, how they want this information to be reported to them and within what timeframes. It can be helpful for investors to agree early on with an investee company what types of GBVH:
• do not need to be reported to them.
• need to be reported to them through routine monitoring (where there is no urgency).
• need to be reported to them as a matter of urgency.
• need to be reported only once any investigations have been concluded.
136. Similarly, investors may also need to decide when and how to escalate reports of GBVH within their investments internally within their own organisations and potentially to their partners too.

**BOX 55: Maintaining confidentiality in what is reported to investors**

Companies and investors may find themselves in a position where a survivor, does not want any action to be taken on a report of GBVH, including any information to be shared with others, but there is a policy or contractual requirement for companies to escalate the report of GBVH to their investors. In-line with a survivor-centred approach it is important that a survivors’ wishes are respected. However, companies could choose to inform an investor that they have been alerted to an anonymous report of GBVH without sharing any further details that could reveal the identity of those involved or any specific details about the report.

137. There is no fixed way of categorising reports of GBVH, but investors could consider the following factors when deciding what needs to be reported to them:

- **Severity** – whether the report relates to an incident of GBVH which is life threatening or life changing
- **Level of control** – whether the report relates to an incident of GBVH which was within the direct control of the company or its suppliers/contractors.
- **Reputational damage** – whether the report relates to an incident of GBVH which presents a high level of reputational risk for the investor.
- **Direct involvement** – whether a report of GBVH directly involves an investor’s own staff or consultants.

**BOX 56: Investor capacity to receive reports**

Investors will also need to consider their own organisational capacity to receive, record and track the reports of GBVH which are escalated to them by their investees. If this capacity is not in place, investors will not be able to responsibly handle reports they receive.

### 6.2.2 Receiving reports of GBVH

138. Reports of GBVH may come to the attention of investors via various formal or informal channels, not just through the official grievance mechanisms in place with companies receiving investments. For example, GBVH may be reported to investors via:

- direct whistleblowing by a survivor or witness to a member of staff or consultant working for an investor, either remotely, for example by email, or in person, for example during a site visit.
- direct observation by a member of staff or consultant working for an investor where they witness GBVH, for example during a site visit.
- research or assessment reports related to the investments, through which GBVH is reported or directly witnessed.
- media reports, for example where a survivor or witness reports GBVH via social media or speaks to a journalist about it.

139. Investors will need to develop a process for how they will record and track the reports of GBVH which they receive. Processes developed by investors will need to ensure that companies are responding to reports and managing any investigations in a satisfactory way.

**BOX 57: Responding appropriately**

Once investors become aware of a report of GBVH it is important that agreed processes are followed and that investors do not inadvertently act in a way which can cause greater harm. Investor staff and consultants need to refrain from:

- making any attempt to investigate the credibility of a report of GBVH;
- contacting individuals involved, whether survivors or witnesses.
• conducting any form of investigation themselves
• asking for details which could compromise confidentiality
• requiring survivors to be provided with support if they do not want to receive it.
• putting pressure on companies to respond in a rushed and ill-thought through way.

140. The following questions are examples of those an investor might ask a company following a report of GBVH within an investment:
• Has someone been assigned to lead the company’s response? Has this person already been trained to deal with such reports?
• Have measures been put in place to protect the safety of those involved?
• Have appropriate support options been identified and offered to survivors and witnesses? Have these been taken up?
• Are plans in place to maintain confidentiality and to protect the identities of those involved?
• Has necessary external expertise been secured, for example legal advice or child protection expertise if the report relates to an incident involving someone under the age of 18?
• Is an investigation warranted? If so, has the survivor agreed this is what they want?
• Is the reported behaviour illegal? If so, does the survivor want the allegation to be reported to the authorities? Has the company sought legal advice?
• Regardless of whether an investigation is going ahead and whether the allegation is being reported to the authorities, are support options still being offered the survivor and any witnesses?
• If an investigation is going ahead, has an investigator been identified and are they in-line with the survivor’s preferences (for example if they have said they would be more comfortable with a woman)?
• Has the investigation been concluded? If so, what is the outcome and have follow up actions been identified?
• Has the investigation outcome been reported to those involved? Has information related to the investigation been securely and confidentially filed?

141. Once an investigation has been concluded, an investor can work with a company to draw lessons from the process to inform future GBVH risk mitigation and response efforts.
7 Monitoring GBVH

142. Key outcome: Understanding the value of ongoing monitoring of GBVH risks and incidents, efforts to mitigate risks and respond to incidents and the methods which can be used to collect and analyse monitoring data

7.1 The benefits of monitoring

143. Effective monitoring provides assurance that GBVH risks and company capacity are being assessed and managed on an ongoing basis throughout the life of an investment, project or operation. For investments, projects or operations which are already underway, assessments of GBVH risks and capacities may not have been undertaken during earlier stages. The monitoring and reporting cycle provides another opportunity to raise questions about GBVH and to identify risks and mitigating actions.

144. Monitoring enables companies and investors to:
- **Review and re-assess GBVH risks on a continuing basis.** New GBVH risks can emerge or existing GBVH risks can increase in severity during delivery of an investment, project or operation. Ongoing risk assessment enables changing risks to be identified and acted upon.
- **Assess company capacity and effectiveness in mitigating GBVH risks.** Monitoring helps to determine whether adequate capacity and resources are in place and whether they are having the intended effect in mitigating GBVH risks. Where new or increased GBVH risks have been identified, companies and investors can make informed decisions about new or revised action that is needed. These decisions can help companies and investors to improve their performance in reducing the risk of incidents.
- **Review effectiveness in responding to reports of GBVH.** Monitoring means it is possible to assess whether appropriate response mechanisms are in place so that necessary improvements can be identified.

145. Information on GBVH will not usually be provided in regular monitoring reports unless it is explicitly asked for. Investors can request that companies record, collate and analyse GBVH-related monitoring data as part of regular contractual reporting.

146. The reporting of monitoring data can enable a more tangible ongoing discussion between investors and companies about GBVH risks and mitigating actions. Monitoring data can also be reported internally within companies in order to strengthen accountability for commitments on mitigating GBVH risks and responding to reports. The use of monitoring data to support internal accountability can include submitting progress reports to company boards and to staff and their representative organisations. Companies can also visibly demonstrate their ongoing commitment to tackling GBVH by making monitoring findings publicly available, for example by including explicit sections on GBVH in their annual company reports.
In order to monitor safely and effectively, the overarching principles described in section 3 will need to be applied to all monitoring activities. It is important that companies and investors keep the following in mind:

- **Prioritising people’s safety.** Throughout monitoring, the safety of workers, community members and service users is paramount. All data which is used for monitoring needs to be securely recorded and stored so that confidentiality is always maintained.
- **Recognising that experiences vary.** Monitoring needs to take account of the fact that the effectiveness of mitigating actions and grievance mechanisms may vary for different groups of workers, community members or service users.
- **Integrating GBVH into existing processes.** Monitoring activities related to GBVH need to be absorbed into the everyday business of companies and investors, rather than viewed as an additional and separate task. GBVH can be reflected in existing monitoring approaches.

### 7.2 Collecting and analysing data

147. An important way for companies and investors to track the effectiveness of actions to mitigate GBVH risks and respond to reports is through the use of key performance indicators (KPIs). KPIs need to be context specific and disaggregated, where appropriate. Annex 7 lists some examples of KPIs which can be adapted by companies and investors.

148. Quantitative KPIs can be helpful for tracking progress in areas that are readily measures and which are known to be a concern. For example, if a company sets out to train its entire workforce on GBVH, then it is important to know what percentage of the workforce has been trained. However, it is also important to gather feedback on issues which were not anticipated from the start. Collecting wider feedback helps to identify unintended effects of mitigating actions and GBVH risks which have remained hidden. The use of qualitative methods and open-ended questions can provide workers, community members and service users with the space to raise these broader issues. It can therefore be helpful to select a mix of qualitative and quantitative KPIs.

### Tip: Timebound indicators

The timeframes used within KPIs will determine how frequently data needs to be collected and analysed based on risk and practicality. For example, if GBVH risks are potentially high, then a KPI could be: “number of reports of GBVH received through company reporting mechanism in the last month”. In contrast, if GBVH risks are considered to be low, then the KPI could be changed to “number of reports of GBVH received through company grievance mechanism in the last six to 12 months”. Monitoring should also be more frequent when the conditions monitored are expected to change rapidly.

149. Examples of methods which can be used to track progress against KPIs are summarised below.

#### 7.2.1 Basic data from company records

150. Initial assessments of company capacity and resources to mitigate GBVH risks and to respond to reports can provide a baseline against which to monitor change. The same questions used in the original assessments (as described in section 3 and listed in Annex 2) can be repeated at set intervals in order to track the extent to which a company is making progress.

151. Companies can also record very basic data as part of their monitoring approach. This could include:
- the number of reports of GBVH coming through company grievance mechanisms.
- the number of workers who have received GBVH-related training.
• the number of community members who have attended GBVH-related awareness raising events.
• the percentage of staff who have signed a code of conduct.

**BOX 60: Prioritising confidentiality and safety**
There is potential value in understanding which types of workers, community members and service users are reporting GBVH and what forms of GBVH they are reporting. However, the potential risks associated with collecting and analysing this data could mean that it is safer not to collect it under certain circumstances. Especially in smaller companies, even anonymised monitoring information disaggregated by people’s sex, age, disability status, grade or job-type could reveal who they are and put them at risk.

**BOX 61: Interpreting reporting numbers**
Caution should be exercised when interpreting data on numbers of reports of GBVH. An increase in reports does not necessarily mean there has been an increase in actual GBVH. Instead, increased reports of GBVH can be a sign that grievance mechanisms are being used, perhaps because they are more effective, better known, and more trusted.

Rather than being reassuring, the absence of any reports of GBVH is potentially a cause for concern. A complete lack of any form of GBVH is unlikely, especially in companies with a large workforce and those which interact with local communities and/or provide services. An absence of GBVH reports can be a result of fear, shame and stigma which deters survivors and witnesses from coming forward. A lack of GBVH reports can also be a sign of problems with grievance mechanisms, a company culture which discourages reporting and/or a lack of trust among communities and service users.

Where trends in reporting data have been identified but cannot be easily understood, companies and investors may want to seek the support of a GBVH expert. Drawing on expertise in this way can help to avoid misinterpretation of the data and wasted efforts on actions which are unnecessary.

### 7.2.2 Surveys

152. Anonymous surveys can be used to gather information from workers, community members and service users on the effectiveness of GBVH mitigation measures and grievance mechanisms.

153. The use of surveys in this way can send an important message to workers, community members and service users that the company is committed to mitigating GBVH risks and ensuring it responds effectively to reports.

154. Companies can work with a GBVH expert either to design targeted GBVH surveys or to integrate GBVH-related questions into existing worker, community or service user surveys which they already use. Integrating GBVH in existing surveys can help to locate it as a core priority rather than an additional consideration and can also help to improve response rates so that more information is collected.

**BOX 62: Making sure survey questions don’t cause further harm**
It is important that surveys do not directly ask workers, community members and service users whether they have experienced GBVH. Doing this could risk re-traumatising people and putting them at risk if the responses they give become known to others.

155. Surveys can be used to monitor various aspects related to GBVH, as outlined in Table 16.
Table 16: Example survey questions related to GBVH

<table>
<thead>
<tr>
<th>Topic</th>
<th>Example survey questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Knowledge and awareness</td>
<td>• Do you know where to find the company’s policies and procedures on GBVH?</td>
</tr>
<tr>
<td></td>
<td>• To what extent do you understand the company’s policies and procedures on GBVH?</td>
</tr>
<tr>
<td>Feelings of safety</td>
<td>• How safe do you feel at work/when accessing X service/when engaging with the company?</td>
</tr>
<tr>
<td></td>
<td>• How safe do you feel travelling to and from work?</td>
</tr>
<tr>
<td></td>
<td>• Do you think GBVH risks in your workplace/community have increased, decreased or stayed the same over the last year?</td>
</tr>
<tr>
<td>Views on company culture and leadership</td>
<td>• How committed do you think the company is to addressing GBVH?</td>
</tr>
<tr>
<td></td>
<td>• Do senior members of staff demonstrate commitment to addressing GBVH in the company?</td>
</tr>
</tbody>
</table>

**BOX 63: Tip: Reminding people of the definition of GBVH**

Some respondents may answer questions inaccurately simply because they do not know or remember what constitutes GBVH. It can therefore be helpful to state the definition of GBVH used in company policies in order to help workers, community members and service users understand the questions they are being asked.

156. For people who already use computers and mobile phones, conducting surveys electronically can be a helpful way of reassuring people of anonymity. This reassurance can encourage more honest responses. It can also make it easier to ensure survey questions are provided in accessible formats and in appropriate languages. However, the design of electronic surveys will need to take account of languages spoken and literacy levels of the intended respondents, so as not to inadvertently exclude certain groups from the survey which could lead to inaccurate and misleading findings.

### 7.2.3 Feedback forms

157. As well as knowing whether workers or community members have attended GBVH training or awareness raising events, it is also important to understand whether these efforts have been effective. One of the easiest ways of doing this is to use feedback forms immediately after training sessions and community awareness raising activities.

158. Questions included in the forms can be used to:

- ask whether participants have understood the information they have been given.
- find out how helpful people found the trainings, events or materials.
- understand whether there are any remaining gaps in people’s knowledge.

159. Identifying common gaps in understanding can help identify whether more targeted follow up information is needed. This can help inform adaptations to future sessions and material, so they are more effective. Feedback forms can also ask for basic data on characteristics which are relevant to the company’s workforce and local communities in order to enable disaggregated analysis.

### 7.2.4 Observations during monitoring visits

160. In line with the guidance given on assessments in section 3, it is important that during monitoring visits, companies and investors do not ask workers, community members or service users any questions about GBVH or their experiences of it. Doing so could cause further harm to survivors and witnesses.

161. However, staff and consultants working for companies and investors can make some basic observations during monitoring visits in order to consider the following:
• How are you treated as a visitor? Are you briefed on codes of conduct and what is expected of you?
• Is sensitive information about GBVH kept confidential or openly shared?
• When visiting worksites can you see copies of company GBVH policies and procedures?
• Does relevant project material include information about how to report incidents of GBVH?

**BOX 6: Drawing on GBVH expertise when needed**

If monitoring reports or observations during monitoring visits suggest GBVH risks may have increased or raise concerns about mitigation measures and response mechanisms, then a GBVH expert could be commissioned to assess these concerns in greater depth. This work by a GBVH expert at the monitoring stage could be equivalent to the in-depth GBVH assessment described in section 4.3.
Annex 1: Indicators for risk factors related to country and project context

<table>
<thead>
<tr>
<th>Country Context Risk Factors</th>
<th>Example indicators</th>
<th>Source of information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prevalence of GBVH</td>
<td>• Experience of intimate Partner Violence</td>
<td>• Data for intimate partner violence can be available from national demographic health surveys (DHS) based on the percentage of ever married women who have experienced physical or sexual violence committed by their husband or partner in their lifetime. See: <a href="http://www.statcompiler.com">http://www.statcompiler.com</a></td>
</tr>
<tr>
<td>Gender inequality</td>
<td>• Gender Equality Measure</td>
<td>• World Economic Forum’s Global Gender Gap data based on a range of indicators. See wefroum.org/reports/the-global-gender-gap-report-2018</td>
</tr>
<tr>
<td>Gender stereotypes</td>
<td>• Views on whether domestic violence is ever justified (as a proxy for wider views on GBVH)</td>
<td>• Data on justification of wife-beating can be available from DHS based on the percentage of women who agree that a husband is ever justified in hitting or beating his wife for at least one specific reason. See <a href="http://www.statcompiloer.com">www.statcompiloer.com</a></td>
</tr>
<tr>
<td>Poverty</td>
<td>• National poverty rate</td>
<td>• Data on poverty estimates from the World Bank: Poverty and Shared Prosperity 2018 (Table 1A.2). See <a href="http://www.worldbank.org/en/publication/poverty-and-shared-prosperity">http://www.worldbank.org/en/publication/poverty-and-shared-prosperity</a></td>
</tr>
<tr>
<td>Discrimination</td>
<td>• Global Inclusiveness Ranking</td>
<td>• Data on inclusiveness ranking from the Haas Institute (pages 12-13). See <a href="https://haasinstitute.berkeley.edu/inclusivenessindex">https://haasinstitute.berkeley.edu/inclusivenessindex</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project/operation risk factors</th>
<th>Example indicators</th>
<th>Source of information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Labour force</td>
<td>• The recruitment of a large new workforce and/or an influx of migrant or temporary workers</td>
<td>Investment or project documentation, for example Concept Note or design document. Conversations with investment team or company</td>
</tr>
<tr>
<td>Seasonal deadlines</td>
<td>• A sector which has heavy seasonal fluctuations in workload</td>
<td></td>
</tr>
<tr>
<td>Transportation of goods</td>
<td>• The transportation of goods over long distances and overnight through remote communities</td>
<td></td>
</tr>
<tr>
<td>Interactions with communities</td>
<td>• Interaction with community members, especially where worker will be gatekeepers to services and resources and local communities are poor.</td>
<td></td>
</tr>
<tr>
<td>Service provision</td>
<td>• Interactions with service users, especially through the provision of luxury services or</td>
<td></td>
</tr>
</tbody>
</table>

Social Development Direct 75
<table>
<thead>
<tr>
<th><strong>Security personnel</strong></th>
<th>The use of security personnel, especially where armed.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Isolated situations</strong></td>
<td>Isolated location, and/or workers having isolated journeys to and from work.</td>
</tr>
</tbody>
</table>
Annex 2: Questions to assess company capacity and resources

<table>
<thead>
<tr>
<th>Questions to include in GBVH capacity assessment</th>
<th>Sources of evidence companies can use to demonstrate this capacity/resource</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Company leadership</strong> which actively demonstrates commitment to addressing GBVH.</td>
<td></td>
</tr>
<tr>
<td>• Have GBVH risks been identified and are these reflected in the risk management system?</td>
<td>• GBVH risk screening</td>
</tr>
<tr>
<td>• Have elevated GBVH risks been identified for certain groups, for example disabled, LGBTQI+ or migrant workers?</td>
<td>• Risk register/matrix</td>
</tr>
<tr>
<td>• Does the company have a designated GBVH focal point?</td>
<td>• Scope of work/objectives for designated GBVH lead, position filled?</td>
</tr>
<tr>
<td>• Does company leadership communicate clear messages about GBVH and what is expected from staff and external stakeholders?</td>
<td>• Communication materials used by senior leadership</td>
</tr>
<tr>
<td>• Have local organisations and support services been identified which could help with GBVH mitigation and response efforts, including local social and medical support services and existing community resources to address GBVH? Have partnerships been formed with any of these organisations?</td>
<td>• Mapping of local organisations and service providers</td>
</tr>
<tr>
<td>• Have steps been taken to promote diversity, including at senior levels of the company?</td>
<td>• Description of partnerships the company has formed in relation to addressing GBVH</td>
</tr>
<tr>
<td>• Does the social impact assessment include a gender-specific analysis?</td>
<td>• Social impact assessment with gender assessment</td>
</tr>
<tr>
<td>• Were women-only focus groups or women-only community meetings conducted during community consultations?</td>
<td>• Community consultation records/minutes</td>
</tr>
<tr>
<td><strong>Company policies</strong> which set out GBVH mitigation and response efforts and <strong>codes of conduct</strong>, which outline expected behaviours.</td>
<td></td>
</tr>
<tr>
<td>• Is a GBVH policy in place which gives a clear definition of GBVH?</td>
<td>• GBVH policy/ies</td>
</tr>
<tr>
<td>• Has GBVH policy been integrated into wider company policies?</td>
<td>• Policies which address GBVH/ethic code</td>
</tr>
<tr>
<td>• Are written procedures in place to operationalise the company’s GBVH policy?</td>
<td>• Procedures related to GBVH policies</td>
</tr>
<tr>
<td>• Has a clear code of conduct been developed which prohibits all forms of GBVH and which is signed by all staff and contractors?</td>
<td>• Code of conduct</td>
</tr>
<tr>
<td>• Do breaches of the code of conduct link to company disciplinary procedures?</td>
<td>• Code of conduct/disciplinary procedure</td>
</tr>
<tr>
<td><strong>Grievance and investigation mechanisms</strong> to encourage and enable GBVH to be reported.</td>
<td><strong>Recruitment and performance assessment systems</strong> which support GBVH risk mitigation.</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>• Are GBVH policies and procedures available to workers and external stakeholders in accessible formats?</td>
<td>• Are GBVH policies and procedures available to workers and external stakeholders in accessible formats?</td>
</tr>
<tr>
<td>• Policies and procedures related to GBVH policies</td>
<td>• Policies and procedures related to GBVH policies</td>
</tr>
<tr>
<td>• Is a confidential grievance mechanism in place where reports and concerns related to GBVH can be raised? Are accessing reporting channels available to workers, community members and service users?</td>
<td>• Company procedures for grievance and investigation procedures related to GBVH incidents</td>
</tr>
<tr>
<td>• Are procedures in place to respond to reports of GBVH when they are made, including clear investigation procedures?</td>
<td>• Company procedures for grievance and investigation procedures related to GBVH incidents</td>
</tr>
<tr>
<td>• Is there a pool of trained individuals (including men and women) who could take the lead in responding to GBVH reports as they come in?</td>
<td>• HR records</td>
</tr>
<tr>
<td>• Do job advertisements state that the company does not tolerate GBVH in any of its operations?</td>
<td>• Recent job advertisement</td>
</tr>
<tr>
<td>• Have written procedures been developed for recruitment processes?</td>
<td>• Procedures for recruitment</td>
</tr>
<tr>
<td>• Are all workers on formal contracts, including temporary workers?</td>
<td>• Breakdown of the types of contracts workers are on</td>
</tr>
<tr>
<td>• Is GBVH stated as a disciplinary offense in all contracts for employees and contractors?</td>
<td>• Wording included in contracts</td>
</tr>
<tr>
<td>• Are written procedures in place for performance appraisals, promotions and any performance-related pay (if applicable)?</td>
<td>• Procedures for performance appraisals, promotions and performance-related pay</td>
</tr>
<tr>
<td>• Have opportunities for women as part of the project, either as employees or as part of the supply chain been explored?</td>
<td>• Social impact assessment</td>
</tr>
<tr>
<td>• Is a plan in place to attract and retain women?</td>
<td>• Diversity plans</td>
</tr>
<tr>
<td>• Is refresher training provided on a regular basis?</td>
<td>• Records of numbers of staff who have received GBVH refresher training and the dates it was delivered</td>
</tr>
<tr>
<td>• Is feedback collected to know if the GBVH training was effective?</td>
<td>• Copy of feedback forms (or similar) used for GBVH training</td>
</tr>
<tr>
<td>Company efforts to encourage and enable contractors and suppliers to align with its GBVH risk mitigation measures and grievance mechanisms.</td>
<td>• Is information provided during procurement processes to explain company expectations related to GBVH?</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td></td>
<td>• Are clauses included in supplier contracts which commit suppliers to adhere to company GBVH policy and procedures?</td>
</tr>
<tr>
<td></td>
<td>• Have efforts been made to raise awareness and share knowledge on GBVH with suppliers?</td>
</tr>
<tr>
<td>GBVH risk mitigation considered in the design of physical spaces.</td>
<td>• Has GBVH been included in safety assessments of spaces used by workers, community members and service users, including workers’ accommodation and commutes to and from work?</td>
</tr>
<tr>
<td></td>
<td>• Analysis of feedback provided after most recent GBVH training</td>
</tr>
<tr>
<td></td>
<td>• Outline of sessions for enhanced training and list of job titles for those who have received it</td>
</tr>
<tr>
<td></td>
<td>• Have awareness raising activities been conducted with external stakeholders, including community members and service users?</td>
</tr>
</tbody>
</table>
Annex 3: Integrating GBVH in terms of reference for conducting ESIAs

1  Introduction
Terms of reference for Environmental and Social Impact Assessment (ESIAs) vary widely, depending on the organisation and sector of focus. There are, however, standard aspects that are covered in most ESIAs, whether they follow IFC/EBRD Performance Standards and requirements, or similar standards such as the Equator Principles, OECD Guidelines, etc. This annex therefore sets out key steps and requirements that can be inserted into the terms of reference for any ESIA to strengthen GBVH considerations. It is expected that the incorporation of GBVH will be proportionate to the level of GBVH risk initially identified, unless investigations during the ESIA indicate the need to take a different approach.

Not all ESIAs will need detailed GBVH assessments and in some cases there may need to be different levels of GBVH focus for different components of an investment. Key screening and scoping steps can be used to determine the level of assessment required, and for which aspect of the investment, although it is recognised that sometimes this is an iterative process where certain decisions can only be made as more information becomes available.

2.  GBVH considerations to be covered in an ESIA
A robust terms of reference will ensure that there is adequate language included so that GBVH risks are sufficiently considered and managed. Below, typical ESIA components incorporating GBVH risk considerations are organised using the most relevant IFC/EBRD performance standards and requirements as an example. This is not exhaustive but an indication of the type of wording that might be included in the terms of reference for an ESIA

2.1  Assessment and Management of Environmental and Social Risks and Impacts and PR10 Stakeholder Engagement

<table>
<thead>
<tr>
<th>Policy and Contextual Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>• In carrying out the policy and contextual review, the ESIA should consider carefully the country or local area level contexts which indicate a risk of GBVH. This review could include consideration of the prevalence of intimate partner violence, country level laws and regulation which have limited recognition of LGBTQI+ rights, high poverty rates, conflict or post-conflict situation etc.</td>
</tr>
<tr>
<td>• A potential investor’s ESDD should include a broad level information on the company seeking investment. Issues to be considered include the company’s record on worker rights and human rights in general as well as willingness to manage GBVH risk.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Stakeholder Analysis</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Stakeholder Analysis carried out for the ESIA should be gender sensitive and should include analysis for different groups of vulnerable and marginalized people (elderly, people living with disability, youth, caste etc.). It should be able to take account of the potential for compounded risks.</td>
</tr>
<tr>
<td>• It is important that the stakeholder engagement explores issues around power dynamics so that imbalances of power and potential GBVH risks are considered in both the implementation and analysis of stakeholder engagement.</td>
</tr>
<tr>
<td>• Through the findings of the stakeholder analysis, there should be the development of a community-based grievance mechanism that is accessible, and trusted. Whilst existing community structures are often integrated into grievance mechanisms, care must be taken to ensure that they do not reinforce social dynamics that may increase the risk of GBVH.</td>
</tr>
</tbody>
</table>

2.2  Labour and Working Conditions

| With regard to labour and working conditions, three interfaces are important, the worker company level, the worker-community interface and the worker-user interface. |

<table>
<thead>
<tr>
<th>At the worker-company level</th>
</tr>
</thead>
<tbody>
<tr>
<td>In making an assessment of labour and working conditions the ESIA should ensure that:</td>
</tr>
</tbody>
</table>
• The review of HR policies looks specifically at issues that impinge on the management of GBVH risks such as whether gender equality is addressed and whether there is a code of conduct on GBVH.
• Assessment of worker accommodation to ensure that both design and code of conducts create a safe environment for all.
• There is in place an employee grievance mechanism (GM) that is accessible, respected and trusted by workers? Is the GM appropriate to manage GBVH, i.e. guaranteeing confidentiality and ensuring that GBVH grievances are managed in a way that ensures due process and protects complainants?
• Is the project reliant on migrant workers and what policies are in place to safeguard these workers? Is information given in a language or form that is understandable by all workers? Link this work the assessment of modern slavery.

At the worker – community interface
This is a key area of GBVH risk and not only for projects with influx of workers. The ESIA needs to explore:
• Changing power dynamics within the home due to an increase in female employment which could lead to an increase in domestic violence.
• Increased income in the family due to employment which could lead to increased use of alcohol and drugs.
• The likely use of workers from outside the area and whether these workers have been given training on local customs and appropriate interaction with communities.
• Development of a community-based grievance mechanism that is accessible, and trusted.

At the worker – user interface
Investment such as health care and education facilities also need to assess the particular power dynamics created and assess the potential for risks and appropriate mitigation measures. The ESIA should review at the type of investment and the context in which it is located to determine risk. Is a service facility located in a poor isolated area which may lead to a greater inequality of interaction between worker and user, placing the latter at greater risk? Or is the power dynamic likely to be the other way, where the worker is placed at GBVH risk from the user?
What are the mitigation measures that are most appropriate given the cultural context and the type of investment?

2.3 Community Health, Safety and Security
Depending on the project, risks around GBVH can occur due to direct power imbalances such as that with security guards, or due to the design of a project which can create or increase risks of GBVH. Depending on the project, these risks can occur both during project construction and operation. Specifically, the ESIA should consider:
• If security guards are used by the project (whether private or private-public), have these guards been given training on human rights and rules of engagement with the community. Is this training just a one-off exercise or carried out at appropriately phased intervals?
• Are work and accommodation areas designed in a way that avoids creating space or human movement routes that could increase the chance of isolated worker-worker or worker-community interface. These could be measures as simple as ensuring separate male and female toilets as well as lockable toilets; ensuring adequate lighting in the evening for workers walking from dormitories to canteens.
• Where a project creates additional movements such a new highway, assess whether this will increase use of road for long distance goods movement and if adequate measures are put in place to manage engagement with communities in places such as trucking stops.

2.3 Land Acquisition and Involuntary Resettlement
The development of a resettlement action plan (RAP) requires considerable engagement with communities and at the same time has implications for assets and resources, all of which can lead to complex social dynamics:
• Socio-economic research for a RAP should be carried out in a way that takes account of community and intra-household social dynamics and provides protection of vulnerable people.
• Where people are required to move into a new community the RAP should ensure that measures are in place to manage community interactions and potential for increased GBVH risks.
• Disruptions to communities can place increased economic pressures on families and require family members to take on new roles and responsibilities. This can increase tensions and increase the risk of domestic violence. Development of the RAP needs to take account of these risks and develop appropriate mitigation measures.

3 Linking to the GBVH Risk Screening and In-depth Assessment
The ESIA will need to be linked to indicators used for screening. It is likely that at the start of the ESIA not all the different data sets required for the risk indicators will be available or they may be available in a partial manner. Through the process of ESIA, it should be possible to complete all the information required by the risk indicators that is relevant for the investment.

Where possible the assessment of GBVH risks and mitigation measures should be mainstreamed into the overall assessments of the ESIA, but in cases where the findings reveal high risks there will need to be an in-depth assessment. This in-depth assessment might be for a very specific component of the ESIA, for example worker accommodation, or it might be needed for a specific worker-service user interface, or it might be needed to better understand a socio-economic context. Where in-depth assessment is needed, please refer to the template in Annex 3.

4 Monitoring Phase
With regard to GBVH, the monitoring phase is particularly important as it will serve not only to monitor mitigation measures put in place but also to identify risks that have been overlooked, or new risks that have emerged.

The monitoring phase needs to be developed in a way that takes advantage of longer and more continuous presence of project staff in the field to look out for new risks.

5 Professional Skills Requirement
Where the initial risk assessment through the use of risk indicators has identified the investment to be low risk, the review and further assessment of GBVH can be carried out through a skilled social specialist with project experience. Where there are areas of the project which show characteristics of higher risk or require the collection of primary data, the process and methodology used should be checked by a social specialist with GBVH expertise. This is important to both be able to identify GBVH risks which are often hidden and under-reported but also to ensure that the investigation and assessment is carried out in a safe way.
**Annex 4: Template for a company GBVH Policy**

<table>
<thead>
<tr>
<th><strong>The purpose of the policy</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Statement of company commitment to addressing GBVH</td>
<td></td>
</tr>
<tr>
<td>List those the policy applies to (explicitly stating that it covers all workers regardless of their contractual status, including employees, temporary contractors, interns, volunteers and candidates)</td>
<td></td>
</tr>
<tr>
<td>Company definition of GBVH, with a list of behaviours which constitute GBVH (providing relevant examples related to workers, the wider supply chain, community members and service users, as appropriate)</td>
<td></td>
</tr>
<tr>
<td>Description of GBVH-related behaviours which are against the law, with a description of relevant legal responsibilities</td>
<td></td>
</tr>
<tr>
<td>Outline of GBVH training provided by the company and stated requirement for all workers to participate</td>
<td></td>
</tr>
<tr>
<td>Outline of company grievance mechanisms and response procedures, including formal investigation procedures. (with reference to other relevant company policies as needed)</td>
<td></td>
</tr>
<tr>
<td>Briefly description of the links to company disciplinary procedures.</td>
<td></td>
</tr>
<tr>
<td>Statement on dealing with false accusations of GBVH, with links to disciplinary procedures.</td>
<td></td>
</tr>
<tr>
<td>List of support services and safety measures available to survivors and witnesses, including to protect from reprisals</td>
<td></td>
</tr>
<tr>
<td>Space for workers to sign the policy and state they have understood its content.</td>
<td></td>
</tr>
</tbody>
</table>
Annex 5: Template for a company code of conduct

<table>
<thead>
<tr>
<th>Outline of company <strong>mission statement, values and principles</strong> and the standards of professional conduct these link to (with a clearly statement on the unacceptability of all forms of GBVH).</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Company <strong>definition</strong> of GBVH with examples of how company operations or actions might exacerbate them</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Description of <strong>who the code of conduct applies to</strong> (specifically referencing various types of workers)</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Brief outline of what settings the code of conduct applies to, including interactions with other workers, with those in the supply chain, with community members and with services users. List specific examples, e.g. in the workplace, travelling to and from work, employer-provided accommodation, communications, and work-related social events, training and travel,</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>List of:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• <strong>behaviours expected of workers</strong> (e.g. to report GBVH, to treat all people with respect, to participate in GBVH training, to read company policies related to GBVH, to respect confidentiality etc)</td>
</tr>
<tr>
<td>• <strong>behaviours which are illegal</strong> under national law</td>
</tr>
<tr>
<td>• <strong>behaviours which are not permitted</strong> by the company, even if they are not a crime (including physical, verbal, non-verbal and sexual behaviours, false accusations of GBVH)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Outline of the procedure for <strong>reporting breaches</strong> of the code of conduct</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Outline of how the code of conduct will be <strong>implemented</strong>, including:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Communication of the code of conduct through company training</td>
</tr>
<tr>
<td>• Sanctions for those who breach the code of conduct, including links to company disciplinary procedures</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Space for workers to <strong>sign</strong> the code of conduct and state they have understood it (with options that indicate that they have attended training on the code and/or that they have read and understood the code. Reference to the process for workers to request further clarification on the code of conduct, if required.</th>
</tr>
</thead>
</table>
### Annex 6: Example Key Performance Indicators

Example KPIs for monitoring GBVH risks and efforts to mitigate and respond

<table>
<thead>
<tr>
<th>Example KPI</th>
<th>Measure</th>
<th>Source of data</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Reporting</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of reports of GBVH received through the company grievance mechanism</td>
<td>Number</td>
<td>Reporting records</td>
</tr>
<tr>
<td>Percentage of reports of GBVH which have been investigated in the past year</td>
<td>%</td>
<td>Reporting records</td>
</tr>
<tr>
<td><strong>Leadership</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage of workers who think senior management is committed to addressing GBVH</td>
<td>%</td>
<td>Staff survey</td>
</tr>
<tr>
<td><strong>Accessibility</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policies, procedures, training and awareness raising materials translated into relevant languages and in accessible formats</td>
<td>Qualitative</td>
<td>Training documents</td>
</tr>
<tr>
<td><strong>Policies and procedures</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage of workers who know where to find company policies and procedures related to GBVH</td>
<td>%</td>
<td>Staff survey</td>
</tr>
<tr>
<td>Percentage of workers and contractors who have signed a Code of Conduct related to GBVH</td>
<td>%</td>
<td>HR records</td>
</tr>
<tr>
<td><strong>Training and awareness</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage of workers who have attended GBVH training</td>
<td>%</td>
<td>Training records</td>
</tr>
<tr>
<td>Number of workers who have received enhanced GBVH training for specific roles (for example if they have a role in responding to incidents)</td>
<td>Number</td>
<td>Training records</td>
</tr>
<tr>
<td>Number of GBVH awareness raising activities delivered to communities</td>
<td>Number</td>
<td>Community engagement records</td>
</tr>
<tr>
<td><strong>Safety</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage of workers who feel safe at work</td>
<td>%</td>
<td>Staff survey</td>
</tr>
<tr>
<td>Percentage of workers who feel safe travelling to and from work</td>
<td>%</td>
<td>Staff survey</td>
</tr>
<tr>
<td>Percentage of workers who think GBVH risks at work have decreased</td>
<td>%</td>
<td>Staff survey</td>
</tr>
<tr>
<td>Percentage of community members/service users who feel less safe since investment activities/company operations started.</td>
<td>%</td>
<td>Community surveys</td>
</tr>
</tbody>
</table>
Endnotes


3 ILO, What is child labour. ILO [online] Available at: https://www.ilo.org/ipec/facts/lang--en/index.htm


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