Addressing Gender-Based Violence and Harassment

Emerging Good Practice for the Private Sector

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Introduction

There is growing recognition that operators in the private, public and non-profit sector need to address gender-based violence and harassment (GBVH) more proactively. For the private sector, this is motivated by the need to prevent the physical, sexual, emotional and financial harm GBVH causes to individuals, as well as the financial, reputational and legal risks it poses to businesses and investors.

GBVH is widespread. It affects both men and women, but is most often perpetrated by men against women and girls, with more than one in three women having experienced some form of physical or sexual violence during their lifetime.[1] GBVH is not inevitable, however, and can be prevented. When it does happen, it is important that it is responded to in a responsible and effective way.

Addressing GBVH in the private sector is a relatively new and complex area. CDC, the EBRD and IFC recognise the need for companies and investors to have access to practical guidance. All three organisations jointly commissioned this guidance note, which outlines emerging practices in addressing GBVH in operations and investments. These practices are drawn from recent experience in the private sector, as well as a larger body of work from the non-profit sector. The guidance provides an opportunity to engage with stakeholders to refine practices as those in the private sector collectively gain implementation experience.

Although GBVH is a global issue, perpetrated in all countries, the guidance is tailored to emerging markets. While it highlights some sector-specific risks, the guidance is broadly aimed at all sectors and primarily serves two audiences:

In addition to this note, sector-specific briefs provide targeted guidance on addressing GBVH risks in key sectors, including transport, construction and manufacturing.

All companies and investors can take effective action to assess, prevent, respond to and monitor GBVH. However, it is important that they act in a thoughtful and considered way. Rushed and ill-informed approaches to tackling GBVH could exacerbate risks and cause further harm to survivors, especially if support services are not in place. The guidance, therefore, highlights areas where particular caution should be taken and where GBVH expertise is needed to implement efforts in a safe and ethical way.

It is also important to underline that there is no "one-size-fits-all" approach to addressing GBVH. Efforts to prevent GBVH and to respond to reports need to be context-appropriate, so the guidance may need to be adapted to company size, operating environment or type of work. An important aspect of the operating environment will be the legal context. It is not possible for the guidance to take into account variations in national legislation, so it is not a substitute for specific legal advice.

Investors
staff and consultants working for investors and financial intermediaries providing finance in emerging markets, such as banks, funds and private equity firms

Companies
staff and consultants working for small, medium and large private sector firms operating in emerging markets

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What this note does not cover

This note does not directly address violence and harassment motivated by factors other than gender, for example, religious hatred or discrimination based on disability, age, ethnicity or political affiliation, even though GBVH can be compounded by other forms of discrimination.

It does not address modern slavery and human trafficking. Guidance on these issues can be found in the following documents:

📓 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.

📓 Unlocking Potential: A Blueprint for Mobilizing Finance Against Slavery and Trafficking focuses on how financial-sector actors can address modern slavery and human trafficking.

This note does not specifically address violence against children, even though children are more vulnerable to many forms of GBVH than adults. More comprehensive information on violence against children can be found in the following documents:

📓 Children, Young People and Work: Guidance summarises the 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.

📓 International Child Safeguarding Standards outlines the four core standards for international child safeguarding and provides guidance on how organisations can meet their responsibilities for safeguarding children.

This note provides guidance to investors on preventing and responding to GBVH associated with the investments they are funding. Although beyond the scope of this note, it is also important that investors develop and implement policies and procedures on GBVH within their own organisations.

Legend	
⊘	Clarification
💡	Tip
👁	Case study
⚠	Caution
➡	Continuation
📓	Further reading

Acronyms

CDC	CDC Group plc
CEDAW	Convention on the Elimination of all Forms of Discrimination Against Women
CHS	Core Humanitarian Standard
DFID	Department for International Development (UK)
DHS	Demographic health survey
EBRD	European Bank for Reconstruction and Development
EIGE	European Institute for Gender Equality
ESDD	Environmental and social due diligence
ESAP	Environmental and social action plan
ESIA	Environmental and social impact assessment
ESMP	Environmental and social management plan
ESMS	Environmental and Social Management Systems
ETI	Ethical Trading Initiative
GBV	Gender-based violence
GBVH	Gender-based violence and harassment
HR	Human resources
IASC	Inter-Agency Standing Committee
ICED	DFID Infrastructure and Cities for Economic Development programme
ICoCA	International Code of Conduct Association
ICRW	International Center for Research on Women
IFC	International Finance Corporation (World Bank Group)
IFI	International financial institution
ILO	International Labour Organization
ITC	International Training Center
KPI	Key performance indicator
LGBTI	Lesbian, gay, bisexual, transgender and intersex
LGBTQI+	Lesbian, gay, bisexual, transgender, queer or questioning, intersex and other sexual and gender minorities
MERS	Middle East Respiratory Syndrome
NGO	Non-governmental organisation
PR	Performance Requirement
PS	Performance Standard
RAP	Resettlement action plan
SARS	Severe Acute Respiratory Syndrome
SDG	Sustainable Development Goal
SEA	Sexual exploitation and abuse
SEAH	Sexual exploitation, abuse and harassment
SMART	Specific, measurable, achievable, relevant and time-bound
UN	United Nations
UNCRC	United Nations Convention on the Rights of the Child
UNGPs	United Nations Guiding Principles
UNICEF	United Nations Children's Fund
UNODC	United Nations Office on Drugs and Crime
UN OHCHR	United Nations Office of the High Commissioner for Human Rights
USAID	United States Agency for International Development
VAWG	Violence against women and girls
WASH	Water, sanitation and hygiene
WHO	World Health Organization
WPS Index	Women, Peace, and Security Index
ZEGA	Zambian Export Group Association

Glossary

Business partner	Clients/portfolio companies that receive loans/investments; contractors and suppliers that provide services or goods to companies.[2]
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.[3]
Company	Private sector organisations, including recipients of an investment from an investor.[4]
Contractor	A business partner contracted to carry out a service for a company.[5]
Convention	A treaty in international law which once ratified, is binding on a state.
Domestic violence	Any violence between family members and/or current/former intimate partners.
Duty of care	A legal or moral obligation requiring an adherence to a standard of reasonable care to prevent foreseeable harm.[6]
Economic violence	Any act or behaviour which causes economic harm to an individual. Economic violence can take the form of, for example: property damage; restricting access to financial resources; controlling access to health care, employment, education, including agricultural resources; not complying with economic responsibilities such as alimony; excluding from financial decision-making; discriminatory traditional laws or practices relating to property rights and use of communal land.[7]
Gender	The socially constructed roles, attributes, opportunities and relationships that a given society considers appropriate for men and women. 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 most commonly recognised genders and are, therefore, used throughout this guidance.
GBVH	Umbrella term for violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.[8]
GBVH risk	The potential for workers, community members or service users to experience GBVH.
Gender identity	A person's psychological identification as man, woman or other, which may or may not correspond to the person's designated sex at birth and is not related to sexual orientation.
Greenfield site	An area of land that has not been built upon previously, usually agricultural land.
Grievance mechanisms	Processes that can be used by workers, community members and service users to make complaints or report concerns.
ILO Convention No. 190 and Recommendation No. 206	International Labour Organization Convention No. 190 and Recommendation No. 206 of 2019 are the only binding international instruments on violence and harassment in the world of work, setting out a clear framework and global mandate for preventing and addressing it. The Convention protects workers and other persons in the world of work, including employees as defined by national law and practice, as well as persons working, irrespective of their contractual status, persons in training, including 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. It applies to all sectors, whether private or public, both in the formal and informal economy and whether in urban or rural areas.[9]
Intersex	An umbrella term that refers to people who have one or more of a range of variations in physical sex characteristics that fall outside of traditional conceptions of male or female bodies. Some intersex characteristics are identified at birth, while other people may not discover they have intersex traits until puberty or later in life. Note that intersex is not synonymous with transgender.

Glossary

Intimate partner violence	Behaviour by an intimate partner or former partner that causes physical, sexual, economic, and/or psychological harm.
Investor	Financial actor who provides finance to a private company or other investors. This includes staff and consultants working for investors and financial intermediaries providing finance such as banks, funds and private equity firms.[10]
Investment	An asset or item acquired with the goal of generating income or appreciation.
#MeToo movement	A global movement of survivors and their supporters working to raise awareness about and end sexual violence and harassment.
Migrant worker	Any person who is moving or has moved across an international border or within a country 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.[11]
Mitigation	All actions taken to prevent the negative impact of identified risks.
Non-binary	An umbrella term for people whose gender identity does not sit comfortably with "man" or "woman". Non-binary identities are varied and can include people who identify with some aspects of binary identities, while others reject them entirely.
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	A set of planned works or activities to be finished over a period of time and intended to achieve a particular purpose and for which investor financing is sought by an investee.
Report of GBVH	An allegation, concern or problem that a person or people have in relation to their or someone else's treatment.
Safeguarding	The organisational system to prevent harm or unethical behaviour being perpetrated by individuals.
Service user	A person who uses infrastructure, services or resources provided by a company, including public transport, education or healthcare.
Subcontractor	A person or commercial entity contracted to carry out a service for a contractor.[12]
Supplier	Any business that directly or indirectly provides material goods to a company.[13]
Supply chain	The chain of suppliers providing materials, components, goods or products for use in company activities.[14]
Sex	Refers to the external physical differences that act as a marker upon which male or female sex is assigned at birth.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.[15]
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (as defined by the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not a defence.[16]

Glossary

Sexual harassment	Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.[17]
Sexual orientation	Refers to each person's capacity for emotional, affectional and sexual attraction to, and intimate and sexual relations with, individuals of a different gender or the same gender or more than one gender.[18]
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.
Third gender	A category of people who do not identify as male or female, but rather as neither, both, or a combination of male and female genders.
Transgender	An umbrella term used to describe a wide range of identities whose appearance and characteristics are perceived as gender atypical - including transsexual people, cross-dressers (sometimes referred to as "transvestites"), and people who identify as third gender.[19]
Victim	A person who has experienced GBVH. "Victim" is a term more often used in the legal and medical sectors.
Violence and harassment	A range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.[20]
Worker	A person carrying out activities on, or related to, the activities of a company or their business partners. This includes people employed directly or through third parties, such as contractors, subcontractors, labour agencies or suppliers.[21] This includes people in high and low-skilled positions, those engaged informally, in training, interns and apprentices, workers whose employment has been terminated, volunteers, jobseekers and job applicants.
World of work	In the course of, linked with or arising out of work: in the workplace, including public and private spaces where they 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; and when commuting to and from work.[22]
Workplace/worksite	A project or operation's physical location or where work is taking place.[23]

Executive summary

Private sector companies and investors are increasingly recognising that GBVH is a serious issue with far-reaching consequences for workplaces, services and communities. The negative impacts of GBVH on both individual health and wellbeing and businesses can be severe. For companies and investors, GBVH can pose a range of risks, including costly litigation, loss of profits and damaged reputation. Thoughtful action by the private sector can help prevent GBVH from happening in the first place and enable appropriate action to mitigate the impact when it does, including through support to survivors.

This note presents emerging good practice to guide companies and investors in addressing GBVH risks in their investments, projects and operations. It may also be of interest to those in government, state-owned enterprises, trade unions, non-governmental organisations (NGOs) and those investing in public-private partnerships.

The guidance is organised into seven sections covering the various aspects of understanding, assessing, preventing, responding to and monitoring GBVH.

1 / UNDERSTANDING GBVH

GBVH is an umbrella term that covers a range of behaviours, including sexual, physical, psychological and economic abuse. What sets it apart from other types of violence and harassment is that it is directed at people because of their sex or gender, or disproportionately affects people of a particular sex or gender.[24]

GBVH is rooted in gender inequality and unequal power, which can leave people, especially women and girls, vulnerable to violence and harassment and prevent them from reporting it. GBVH is also fuelled by gender stereotypes, which encourage men to be seen as naturally aggressive and dominant. GBVH is also often targeted at those who do not adhere to gender stereotypes as a way of punishing them for deviating from what is viewed as normal or expected behaviour.

It is crucial that investors and companies better understand the range of circumstances in which GBVH can occur and the ways in which company operations can exacerbate GBVH risks.

GBVH is particularly relevant to the private sector when it occurs among a company's workers, in its supply chain, between workers and community members or service users, among users of a company's services or infrastructure, within workers' families and intimate relationships, or is perpetrated by local authorities against workers, community members or service users.

2 / THE BUSINESS CASE FOR ADDRESSING GBVH

There is both a compelling business case and a strong moral and ethical reasons for addressing GBVH in the private sector. The two are also strongly interlinked. All forms of GBVH have a range of negative impacts on the health and wellbeing of individuals and their families. It is important that companies and investors are aware of these impacts and recognise that even forms of GBVH that may initially seem less severe may have a damaging and lasting effect on people's physical, mental, sexual and reproductive health. GBVH can also have a negative financial impact on individuals.

The impacts of GBVH on individuals can also have a knock-on effect on businesses, including:

- unexpected costs through litigation
- loss of confidence among investors and partners
- damaged relationships with local communities and service users
- increased absenteeism and presenteeism among workers
- difficulty securing workers for shifts
- reduced health and safety
- difficulty recruiting new staff and upskilling and promoting existing staff
- increased staff turnover.

3 / OVERARCHING PRINCIPLES

The following principles need to underpin all efforts to assess, prevent, respond to and monitor GBVH.

- **Survivor-centred:** Prioritise the rights and needs of people who have experienced GBVH and listen to their wishes.

- **Safe:** Protect people who experience, witness or report GBVH, as well as those who seek to address it.

- **Context-specific:** Base all actions on a solid understanding of the local legal and social context.

- **Collaborative:** Work with internal and external stakeholders to identify risks, prevent GBVH and respond to reports.

- **Inclusive:** Address the heightened risk of GBVH for certain groups and provide access to independent, objective and non-judgemental spaces to discuss concerns.

- **Integrated:** Address GBVH as part of an organisation's existing processes and management systems.

- **Non-discriminatory:** Locate efforts to address GBVH as part of wider approaches to promote inclusive, diverse and effective businesses.

- **Well-informed:** Draw on expertise, including from GBVH, child protection and legal experts when needed, to help inform approaches and support responses.

It is important that companies and investors recognise that the stakes can be extremely high or even life-threatening for those who speak out against GBVH. Continuous thought, care and sensitivity are needed.

4 / ASSESSING GBVH RISKS, COMPANY CAPACITY AND RESOURCES

GBVH risks will be present in every country and in all organisations, however, a range of factors can exacerbate them. By regularly screening and assessing risks, companies and investors will be better placed to target resources at those investments and areas of operation where GBVH is most likely. In terms of country context, GBVH risks tend to be higher where:

- gender inequality is high and gender stereotypes are strong and widespread

- intimate partner violence is prevalent and national legislation on GBVH is weak

- poverty and discrimination are high, increasing people's vulnerability to exploitation

- corruption among local authorities is widespread and in contexts that are fragile and conflict-affected.

Certain features of an investment, project or operation can also affect levels of GBVH risk, in addition to those associated with the country context. GBVH risks tend to be higher where:

- a large new workforce and/or an influx of male workers is required and/or where temporary, informal and/or migrant workers are needed

- there are seasonal deadlines, with heavy fluctuations in workload

- transportation of goods over long distances and overnight is required

- community engagement in greenfield projects is needed

- services are provided, especially luxury services or highly sought-after basic services

- security personnel are used, especially where they are armed

- worksites are in remote locations, requiring long and/or isolated journeys to and from work.

It is important that assessments are made of company capacity and resources to prevent and respond to GBVH. Investors can incorporate this into their appraisal and due diligence processes. Companies can conduct capacity and resource assessments in their project or operational design phases, or include them in ongoing internal processes.

5 / PREVENTING GBVH AND ENCOURAGING REPORTING

Investors and companies can take action to prevent GBVH and to be ready to respond to reports. It is often easier and more effective to integrate measures into existing systems by:

- **strengthening leadership and company culture**, so that GBVH risks are understood, clear and consistent messages are communicated, necessary partnerships are developed, inclusive organisational structures are developed, and adequate resources are invested

- **developing and communicating policies and codes of conduct** that define GBVH, set out prevention and response measures and outline behaviours that are not tolerated, with clear links to sanctions and disciplinary procedures

- **establishing grievance mechanisms and investigation procedures** that enable GBVH to be reported in a safe and confidential way, with effective channels at project level and for workers, service users and communities

- **strengthening recruitment and performance assessments** so that they address GBVH risks and enable fair and transparent decision-making on hiring, promotions and performance-related pay

- **delivering training and awareness raising**, both internally among workers and externally among communities and service users, providing essential information and enhanced training for those with specific responsibilities for GBVH prevention and response

- **working with contractors and suppliers** to address GBVH through procurement processes, contract selection and negotiation and regular engagement along the supply chain

- **improving the physical design** of worksites and service delivery locations, with safety assessments to identify potential GBVH hotspots for workers, service users and community members.

6 / RESPONDING TO REPORTS OF GBVH

It is important that company and investor responses to reports of GBVH are guided by a survivor-centred approach. This means treating survivors with dignity and respect and in a non-judgemental way, making sure they are safe and enabling them to make informed decisions. Maintaining confidentiality is an essential element in this regard.

When GBVH is reported, companies should respond in a thoughtful and considered way, drawing on GBVH, child-protection and legal expertise as needed, and only ever using trained investigators to conduct investigations. Responding inappropriately to reports of GBVH can undermine the credibility of a company's efforts to address GBVH and may cause further harm to those involved. In contrast, effective handling of GBVH reports can reinforce the message that GBVH is not tolerated, playing an important role in future GBVH prevention. A company's response to a report of GBVH ought to include:

- providing access to immediate support options and monitoring needs

- assigning someone who has had adequate training to lead the company's response

- deciding whether to investigate, only ever using trained investigators to conduct investigations.

Investors need to work with companies to agree what does and does not need to be escalated to them in terms of incident reporting. This should be done in a way that maintains confidentiality and upholds a survivor-centred approach. Investors also need to consider their capacity to receive, record and track any reports they receive. Investors can, for example, question companies about their response to a report of GBVH to track progress.

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 efforts to prevent and respond to GBVH.

7 / MONITORING GBVH

Ongoing monitoring provides assurance that GBVH risks are being tracked and that companies are making meaningful efforts to prevent and respond. New GBVH risks may emerge and existing risks can change over the course of an investment, project or operation, so regular risk reassessment is important.

Monitoring can also help investors and companies to identify whether improvements are needed to prevention and response efforts.

Companies and investors can integrate GBVH into existing monitoring and reporting processes. Key performance indicators (KPIs) are a useful way of monitoring GBVH risks and tracking progress, as long as they are tailored to local context and relevant to company operations.

A range of methods can be used to collect and analyse data associated with the KPIs identified. This can include the use of basic data from company records, surveys of workers, community members and service users, feedback forms following GBVH training or community/service-user awareness-raising activities and observations during monitoring visits.

PART A
Understanding GBVH and the business case for addressing it

1 /
Understanding GBVH

Key objective: *Understanding what constitutes GBVH and the various forms it can take, its root causes and the circumstances in which it can occur*

1.1 / **Background**

In 2019, the ILO adopted Convention No. 190 and Recommendation No. 206 to combat violence and harassment, including GBVH, in the world of work.[25] Convention No. 190 recognises that GBVH can constitute a human rights violation or abuse, that it is a threat to equal opportunities and is incompatible with decent work. It sets out the fundamental principles and rights at work and recognises the different and complementary roles and functions of governments, employers, workers and their representative organisations.

Convention No. 190 and Recommendation No. 206 build on a number of earlier international commitments and frameworks that emphasise the need for urgent and meaningful action to address GBVH and recognise the vital role to be played by the private sector. These include the following conventions (for a complete list of relevant international legislation, see Annex 9):

- the 1958 Discrimination (Employment and Occupation) Convention, which covers sexual harassment as a form of sex discrimination

- the 1979 Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW),[26] which recognises gender-based violence (GBV) as a form of discrimination that seriously inhibits women's ability to enjoy rights and freedoms on a basis of equality with men

- the 1989 Convention on the Rights of the Child (UNCRC), which sets out the rights of every child, including the right to be safe from violence.

Convention No. 190 also underlines the link between GBVH and the 2011 United Nations Guiding Principles (UNGPs) on Business and Human Rights.[27] The UNGPs emphasise the importance of companies assessing and addressing the risks of abuse, with particular attention to GBVH.

Violence and harassment are also explicitly referenced in UN Sustainable Development Goal (SDG) 5 on achieving gender equality. The role that the private sector plays in achieving the SDGs is recognised as pivotal by investors and companies alike.

✅ IFI commitments to address GBVH

At the Safeguarding Summit in London in 2018, international financial institutions (IFIs) reaffirmed their commitment to improving standards, best practices and guidance on preventing GBVH in their organisations and their operations.[28] Some have commitments and policies already in place.

- CDC's Code of Responsible Investing[29] and Gender Equality Position Statement[30] contain various investment-related requirements to promote equal opportunity and non-discrimination. They emphasise the creation of a safe and secure working environment for women and procedures that foster non-discriminatory workplace cultures, with zero tolerance for harassment.

- The EBRD's Environmental and Social Policy[31] and Performance Requirements[32] require the Bank's clients to adopt measures to effectively prevent and address any form of violence and harassment, including GBVH.

- IFC's Environmental and Social Performance Standards[33] require investees to address gender risks, promote non-discrimination and equal opportunity and ensure the health and safety of communities. IFC's Gender Strategy (2017) makes explicit reference to GBVH and assessing gender risks in IFC investment projects.

✅ The difference between sex and gender

Sex refers to the external physical differences that act as a marker upon which male or female sex is assigned at birth. Gender refers to the socially constructed roles, attributes, opportunities and relationships that a given society considers appropriate for men and women. These expectations differ from society to society and change over time.

1.2 / What is GBVH and why does it happen?

GBVH is an umbrella term that includes a range of behaviours, including: sexual exploitation, abuse and harassment; violence and harassment that is physical and/or psychological; and financial abuse. GBVH can be perpetrated as a one-off act or as an ongoing pattern of behaviour. Although GBVH can take many forms, what sets it apart from other types of violence and harassment is that it:

- is directed at people because of their sex or gender, or
- disproportionately affects people of a particular sex or gender.[34]

Figure 1 / Forms of GBVH

SEXUAL
including exploitation, abuse and harassment

ECONOMIC
including restricting access to financial or other resources

PHYSICAL
including the use or threat of force

PSYCHOLOGICAL
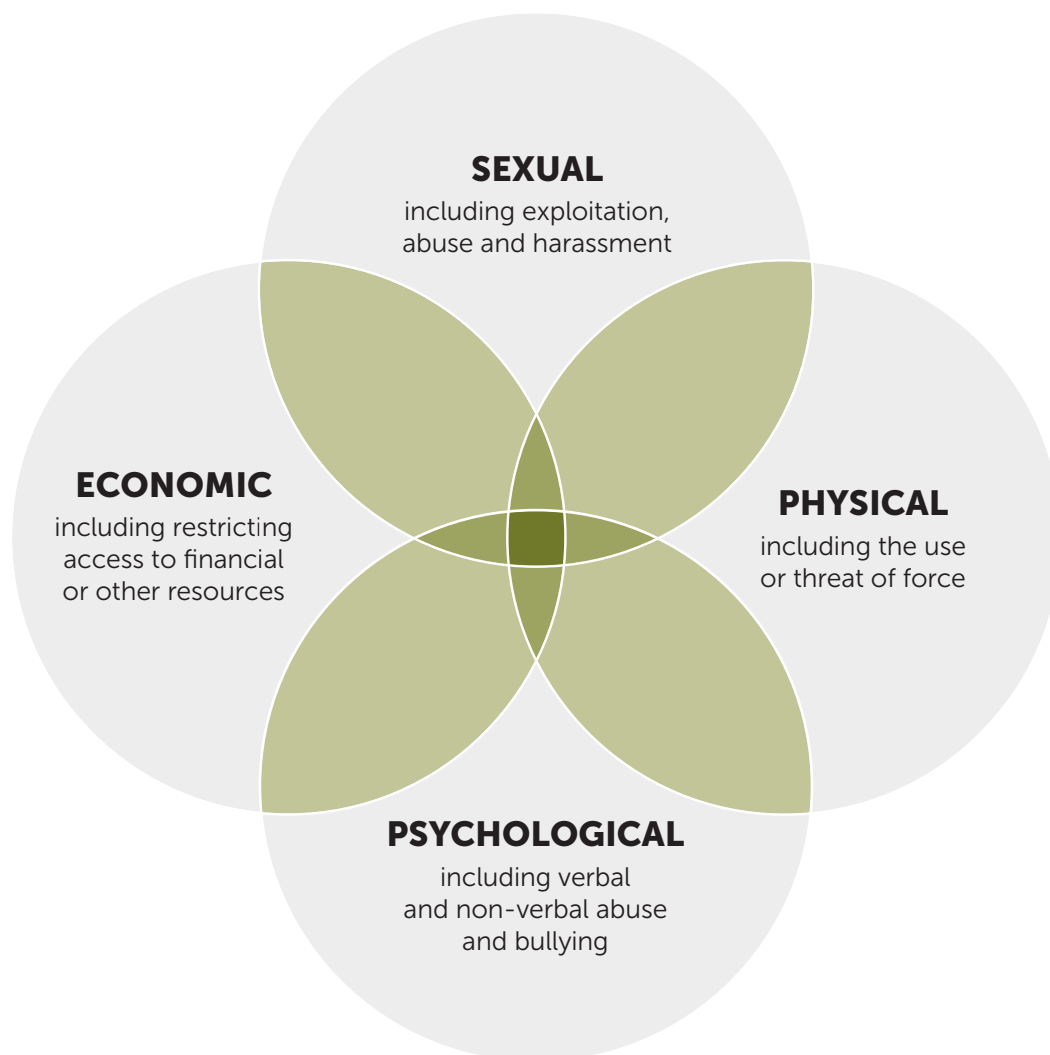including verbal and non-verbal abuse and bullying

Figure 1 shows the different forms of GBVH that can be perpetrated. While sexual and physical violence are more universally recognised, it is important to understand that economic and psychological forms of GBVH also occur. Examples of each of these forms of GBVH are provided in Section 1.3.

1.2.1 / Gender inequality

GBVH is rooted in gender inequality and unequal power, which means women are particularly vulnerable to it. Although GBVH can affect people of any gender, gender inequality can leave women struggling to meet basic family needs, increasing their vulnerability to violence and harassment, including sexual exploitation and abuse. Discrimination against women can also deprive them of access to information about their rights and how to seek help if they are experiencing GBVH. This can lead to a lack of reporting, weakening the deterrent for perpetrators. Children and adolescents often have even more limited access to resources and information about support services than adult women, compounding their vulnerability to GBVH.

Companies and investors may inadvertently reinforce gender inequality and inequality between children/adolescents and adults, increasing the risk of GBVH. For example, male managers and supervisors may be given power over women in lower-paid positions. Within education settings, teachers may be given additional authority to award scholarships, increasing their position of power over children and/or adolescents. Workers may also be put in positions of power over community members and service users.

1.2.2 / Gender stereotypes

Gender stereotypes set expectations about how people of various genders "should" behave. Such expectations can govern every aspect of people's lives, from the type of work they do to the relationships they have and the clothes they wear.

Gender stereotypes can enable GBVH, For example, stereotypes that say men should be dominant and physically aggressive and are entitled to sex and control over women's bodies. Where gender stereotypes are strong, GBVH is often viewed as normal. This can reduce the deterrent for potential perpetrators, as they do not have to worry about repercussions. GBVH can also be used to punish people who do not conform to stereotypes, such as women who take on jobs considered to be "men's work" and men who dress in a way that is deemed feminine.

✓ GBVH against people who are LGBTQI+

Gender identity is a person's identification as man, woman or other (which is legally recognised as a third gender in some countries). This may or may not correspond to the person's designated sex at birth.

Sexual orientation is a person's capacity for emotional, affectional and sexual attraction to individuals of a different gender, no gender, the same gender or more than one gender.

GBVH can be targeted at people because of their gender identity and/or their sexual orientation. This can include using violence and harassment against people who identity as lesbian, gay, bisexual, transgender or other sexual or gender minorities (LGBTQI+) as a way of punishing them for failing to conform to prevailing societal views.

In south-eastern Europe, a survey of more than 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. Forty-one per cent had witnessed negative attitudes, comments and conduct towards LGBTQI+ colleagues. Fourteen per cent had had personal experience of such behaviour. Sixty-four per cent felt the need to hide their sexual orientation or gender identity at work in order to protect themselves, meaning that if they did express their sexual orientation or gender identity, the level ofreported GBVH could have been far higher.

The private sector can play a significant role in fostering diversity and promoting a culture of respect and equality both in the workplace and in the communities where they and their business partners operate. To support the business community in tackling discrimination against LGBTQI+ people, the United Nations Human Rights Office has developed five Standards of Conduct that build on the UNGPs and reflect the input of hundreds of companies across diverse sectors. The standards can be applied by companies all over the world — big and small, local and multinational — to help move the dial in the direction of greater equality for LGBTQI+ people.[35]

1.3 / Where does GBVH occur?

GBVH can occur in a range of circumstances that are directly relevant to the private sector, as outlined in Figure 2. Companies and investors need to be alert to GBVH risks in situations where they have a degree of influence, especially where their operations may contribute to these risks.

Figure 2 / GBVH in private sector investments, projects and operations

Among workers in a company and its supply chain

Between workers and community members

Within workers' families and intimate relationships

CIRCUMSTANCES WHERE GBVH CAN OCCUR

Between workers and service users

By local authorities against workers, community members and/or service users

Among users of company services or infrastructure
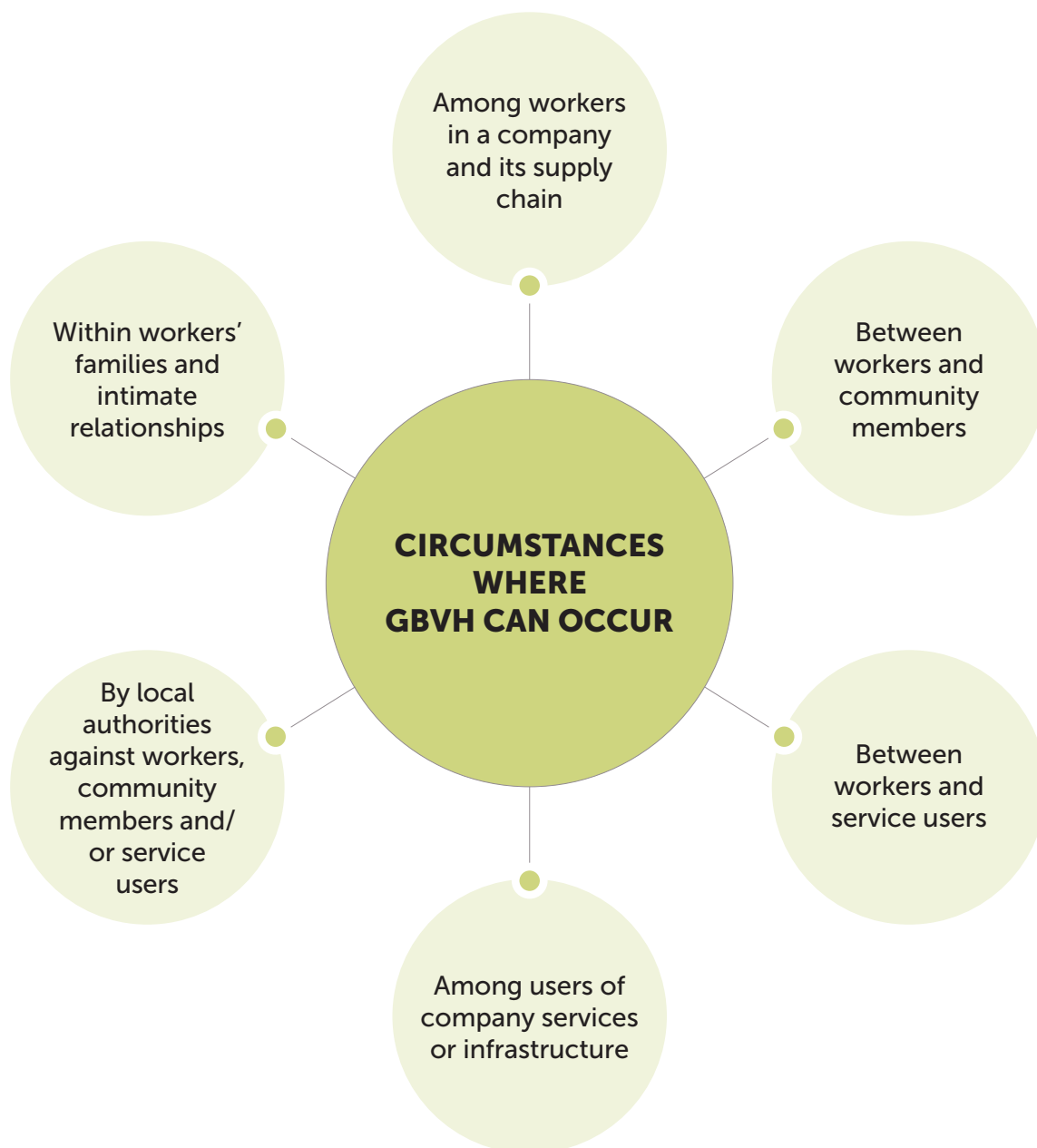
1.3.1 / GBVH among company/project workers and in the supply chain

GBVH can be perpetrated within a company, including by company owners, managers, supervisors or co-workers, and by those associated with it, for example, investors, buyers, contractors or suppliers. GBVH that occurs between workers is not limited to the physical boundaries of a company's offices or worksites and can take place in a range of settings, described as the "world of work" in ILO Convention C190.

Figure 3 / Situations where GBVH can be perpetrated among workers and in the supply chain

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 meal, or uses sanitary, washing or 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

During the recruitment process

Table 1 / Examples of GBVH among workers

Sexual	Physical
• A company owner establishes a sexual relationship with an intern on the basis that he will give them a good reference • A colleague sticks sexually explicit images on the wall of the staff canteen	• A manager hits a staff member when they make mistakes • Supervisors routinely threaten workers to try and make them work faster

Psychological	Economic
• Supervisors make offensive jokes about female colleagues • Co-workers insult a colleague and call him demeaning names because they think he acts in a feminine way	• Managers withhold bonuses from female staff because they think women do not need as much money as men • LGBTQI+ workers are denied training and skills development opportunities that could gain them promotion

Is denying toilet breaks a form of 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, so 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 menstruating women, the inability to use the toilet can be stressful and distressing. Women who are pregnant need to use the toilet more frequently and can suffer pain when unable to do so.

1.3.2 / GBVH between workers and community members

GBVH can be perpetrated between workers and community members, whether the workers come from or reside in local communities, or are visiting from other areas. Interactions can take place before, during or after work, for example, at break times or on daily commutes or through company-led processes, such as community engagement exercises. GBVH can be perpetrated by workers against community members, and vice versa.

Table 2 / Examples of GBVH between workers and community members

Sexual	Physical
• A security guard promises not to report a community member's behaviour if they have sex with them • A worker sends unwanted sexual pictures to a community member after a consultation	• Community members threaten to hit a worker in a social media post because they think she is doing work women should not do • A security guard uses unnecessary force agianst a community member because he doesn't like the fact he is gay

Psychological	Economic
• Workers make insulting jokes about a community member during a community engagement exercise because he is not dressed in a way they expect men to dress • Community members refuse to listen to a worker who is trying to run a consultation exercise because they don't think women should do paid work	• A worker withholds compensation payments to female community members • A security guard demands an extra fee from a construction worker to give them access to the worksite, as they think he acts in a feminine way

Sexual exploitation through prostitution

Transactional sex is common in many private-sector contexts. This can include prostitution, whereby workers buy sex from lower-paid colleagues or from community members. National legislation varies widely on the legality or illegality of prostitution. Even in countries where it is legal, it is important to be alert to differences in power dynamics, which can mean that transactional sex of this kind – while appearing consensual – can be a form of sexual exploitation.

Poverty and lack of access to basic resources among local communities and lower-paid workers can mean they are essentially forced into prostitution. Workers with relatively high levels of disposable income can take advantage of these circumstances. Young women in local communities can be particularly vulnerable to exploitative sexual relationships. Workers' use of prostitutes in local communities can also be accompanied by increased physical violence, sexually transmitted diseases and unwanted pregnancies.

Any prostitution involving those under the age of 18 is a form of sexual exploitation, as minors are unable to give consent. Company views on prostitution involving those over the age of 18 vary considerably, depending on the legal context and the socially accepted behaviours in specific contexts. Some companies choose to take a "zero tolerance" approach to prostitution involving their workers, but there is a risk that this could push prostitution "underground" and expose those engaged in transactional sex to greater risk of GBVH, which then goes unreported.

1.3.3 / GBVH between workers and service users

GBVH can be perpetrated by workers against service users during service provision, or by service users against workers. It is particularly common in the health, education, transport, leisure, hospitality and tourism sectors, but can also occur in other industries.

1.3.4 / GBVH among users of company services and infrastructure

GBVH need not involve workers for it to be a concern to companies and investors. It can be perpetrated by users of a company's infrastructure or services against other users.

Table 3 / Examples of GBVH between workers and service users

Sexual	Physical
• A teacher establishes a sexual relationship with a student with the promise of better grades • A hotel guest sexually assaults a worker who is cleaning their room	• A manager pushes a customer out of a restaurant because they are not wearing clothes they deem appropriate for their gender • A service user emails messages to a worker threatening them with physical violence because they refused to go on a date with them
Psychological	**Economic**
• A bus driver refuses to drive a man because he is wearing clothes not normally associated with his gender • A patient shouts verbal abuse at a male nurse because he is in a role usually held by women	• Healthcare workers deny a woman access to their clinic because they think she is not acting in an appropriate way for a woman • A passenger vandalises a taxi as punishment for the driver's gender identity

Table 4 / Examples of GBVH among users of company services or infrastructure

Sexual	Physical
• A student threatens to publicly reveal a secret about another student if they do not have sex with them • A patient forcibly tries to kiss another patient while they are in hospital	• A customer spits at another male customer because they are wearing clothes more often worn by women • A passenger makes threatening gestures to another passenger on the bus as punishment for their gender identity
Psychological	**Economic**
• Students insult and taunt another student on social media because she is taking a class usually only taken by boys • A patient makes jokes to another patient about how healthcare resources are being wasted on her because she is a woman	• Following a resettlement process, community leaders deny women access to agricultural land • A passenger blocks another passenger's access to a commuter train because he does not think women should be out at night

Women's experiences of sexual harassment on public transport

SRI LANKA	MEXICO CITY	BAKU	KARACHI	BOGOTÁ	MUMBAI	NAIROBI	TBILISI
90%	84%	81%	78%	64%	55%	54%	45%
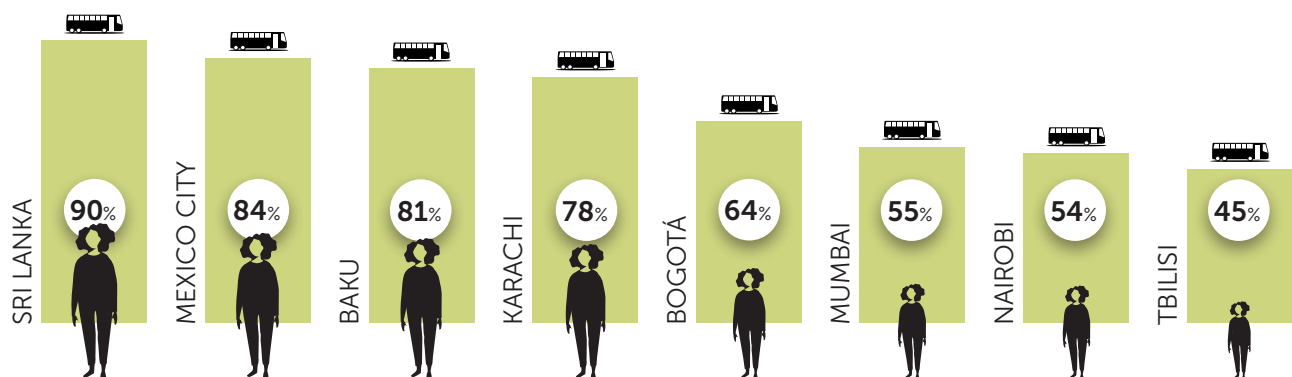
Note: Caution should be exercised in making comparisons between cities, due to slightly different survey sizes/methodologies.
Sources: Sri Lanka, Baku, Karachi and Tbilisi, Mexico City, Bogotá, Nairobi, Mumbai

1.3.5 / GBVH by local authorities against workers, community members and/or service users

Local authorities, including government officials, police and public security forces, may perpetrate GBVH against workers performing activities on behalf of the company. Authorities may also perpetrate GBVH against community members and service users, including where company operations mean local authorities have been invested with new or enhanced powers, for example, in resettlement programmes or the protection of assets.

Table 5 / Examples of GBVH by local authorities against workers, community members and/or service users

Sexual	Physical
• Public security officials make unwanted sexual comments to female cleaning staff • Local government officials suggest that a company will not be provided with necessary permits unless female workers go on dates with them	• A policeman routinely threatens a male worker during his commute as he thinks his uniform is feminine • Public security personnel use unnecessary force against LGBTQI+ community members when protecting company assets
Psychological	**Economic**
• A local government representative makes insulting remarks about a company worker because she is in a role more often held by men • Local police laugh at girls on the way to school, saying there is no point in their trying to learn	• Public security personnel refuse female workers access to worksite because they disagree with a woman's right to work • Local government officials deny women fair compensation during a resettlement process because they do not think they need as much money as men

1.3.6 / GBVH within workers' families and intimate relationships

GBVH often occurs at home, in families, or in current or former intimate relationships. This is known as domestic violence.[36] Domestic violence can have a harmful effect on workers and the companies they work for.

Table 6 / Examples of GBVH within workers' families and intimate relationships

Sexual	Physical
• An employee's relative rapes them • A worker's former partner sends them sexually threatening texts and emails while they are at work	• An employee's partner makes threatening and abusive phone calls to them while they are at work • A jealous husband beats his wife because she has been speaking to male colleagues
Psychological	**Economic**
• A controlling family member decides they do not want their relative to attend work-related training or to stay late • An abusive partner tells a worker she is useless at her job and takes away her confidence to apply for a promotion	• A relative controls a worker's food intake, so they are regularly denied meals • An employee's partner controls their income and refuses to allow them to spend it in ways that would meet their basic needs

✅ Relevance of domestic violence to the private sector

Domestic violence occurs in all countries. Almost a third of women globally have experienced some form of physical and/or sexual violence by an intimate partner during their lifetime.[37] In some countries, the figure is far higher. It is estimated that 137 women globally are killed by a member of their own family every day.[38]

This means that domestic violence is likely to affect some workers in all companies at some point. Domestic violence can have a severe physical and emotional impact on workers, affecting absenteeism and productivity and efficiency in the workplace. When someone is experiencing domestic violence it often continues when they get to work.

Company operations can also lead to an increase in domestic violence, as in the following examples.

- An influx of male workers from outside the local community can cause tensions within families, when "outsiders" who may have access to relatively high levels of income and resources are seen as posing a threat to local women. This can mean that relatives and intimate partners become more controlling of the women and girls in their family, either in an attempt to protect them or to assert control over "their" women.

- New job opportunities can have an impact on families, threaten established roles and sometimes trigger violence. When women gain access to paid work for the first time, men can perceive this as a threat to their status as the main income earner, prompting them to be more aggressive and violent. However, this is not an inevitable outcome of women's employment. Company efforts to raise awareness about the benefits of women's paid work can reduce these risks.

2 /
The business case for addressing GBVH

Key objective: *Understanding the negative impact that GBVH can have on the wellbeing of workers, community members and service users, and the knock-on effects this can have on companies and investors*

There is both a strong ethical argument and a compelling business case for companies and investors to tackle GBVH. The damaging impact of GBVH on individuals can also have severe operational, financial, legal and reputational effects on a business.

By taking steps to address GBVH, companies can support workers' health and wellbeing and that of the community members and service users with whom they interact. Acting to address GBVH can benefit businesses and investors in a range of ways, as outlined in the following sections.

2.1 / The impact of GBVH on individual health and wellbeing

Every form of GBVH can have a range of negative impacts on the health and wellbeing of individuals who experience or witness it. The effects of GBVH are not narrowly limited to the type of behaviour that has been perpetrated; physical violence does not only have a physical impact and sexual violence does not only have an effect on sexual health.

All forms of GBVH, regardless of whether they are one-off or repeated incidents, can have a detrimental impact on people's mental health. The distress, vulnerability, fear and shame that people feel as a result of GBVH can lead to depression, anxiety and/or stress. The effects can be particularly damaging when someone has experienced sexual forms of GBVH.

What may seem like less severe forms of GBVH can also have negative consequences for people's physical and emotional wellbeing. When colleagues repeatedly make degrading sexual jokes or share sexually explicit material, for example, this can create a working environment in which workers feel stressed, anxious and upset, to the detriment of their mental health over time. Repeated physical abuse – for example, where

a factory worker is hit by their supervisor to make them work faster – can have a long-term physical and psychological impact.

All kinds of GBVH can have consequences for people's financial wellbeing and their ability to meet their basic needs, most directly where GBVH involves the withholding of workers' pay or workers leave their jobs to avoid further GBVH. Economic violence can have lasting physical, mental, sexual and reproductive health effects, particularly if it involves people being denied food, water or access to basic services.

GBVH can further have an indirect impact on individuals' families. For example, children can suffer as a result of the physical, mental and financial impact of GBVH experienced by a parent.
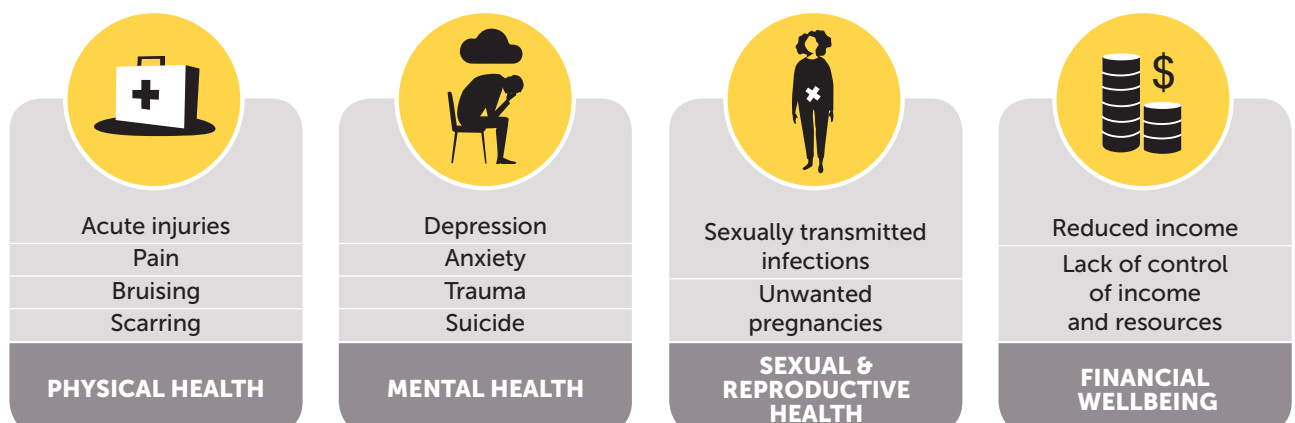
It is therefore important that companies and investors not only consider the violent or harassing behaviour that has been perpetrated, but the range of impacts that behaviour might have.

✓ 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 among 800 female garment workers in Bangladesh in 2016 found high levels of intimate partner violence (69 per cent in the previous year) and workplace violence (74 per cent in the previous month). Furthermore, 40 per cent of female garment workers showed signs of depression, compared with an estimated 4 per cent of adults in Bangladesh generally.[40] Signs of depression include feeling sad and lonely, having difficulty sleeping, loss of appetite and lack of motivation.

Figure 3 / Examples of the impact of GBVH on individuals[39]

PHYSICAL HEALTH	MENTAL HEALTH	SEXUAL & REPRODUCTIVE HEALTH	FINANCIAL WELLBEING
Acute injuries Pain Bruising Scarring	Depression Anxiety Trauma Suicide	Sexually transmitted infections Unwanted pregnancies	Reduced income Lack of control of income and resources

Use of the terms "victim" and "survivor"

People who have experienced GBVH are sometimes referred to as "victims" and sometimes as "survivors". Although people may use these terms interchangeably, the choice of word is often deliberate and based on important differences between the two. For some people, the word "victim" helps to emphasise the negative impact GBVH can have and the need for others to act in order to prevent further violence or harassment and to provide support. "Victim" is the preferred term in the legal and medical sectors, so is often found in national and international legislation.

Many organisations providing support services prefer to use the term "survivor", however, as it emphasises the resilience of the person who has experienced GBVH and the importance of their being able to choose and decide how they are treated and the support they wish to receive. In line with this thinking, the guidance in this note largely refers to "survivors". For further information on a survivor-centred approach to preventing and responding to GBVH, please see Section 3 on the overarching principles and Section 6 on responding to reports.

2.2 / The impact of GBVH on companies and investors

Companies and investors who act to prevent and respond to GBVH can improve the wellbeing of workers, community members and service users. In so doing they can improve health and safety in the workplace, boost productivity and retain talent. Companies and investors can protect and strengthen their reputation among communities and service users by taking action to prevent and respond to GBVH. Such efforts can reduce corporate exposure to litigation and compensation claims, not to mention financial and reputational damage. Conversely, not taking action to prevent and respond to GBVH carries significant risk for firms and investors.

2.2.1 / Litigation, compensation claims and reputation

GBVH can prompt workers, community members or service users to take legal action against companies and investors and make a claim for compensation. It is important that companies and investors are aware of both national and international legislation. For further information on international conventions and commitments, see Annex 9. The risks to businesses include:

- **Unexpected costs:** Litigation 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 involved, compensation can be high, with a detrimental effect on profits and investor returns.

- **Loss of confidence among investors and other businesses:** Investors, partners and suppliers can become concerned about working with a company that fails to understand and address GBVH risks, as this could increase risks to their own businesses and damage their reputations. See the box on IFIs for more detail.

- **Damage to relationships with local communities and service users:** Community members and service users may boycott a company, stage protests or block operations if they believe the company ignored their safety by not acting to prevent GBVH or failed to respond effectively to reports of GBVH. This can inflict direct operational losses and result in reputational damage, hurting a company's profits, delivery and ability to recruit locally.

The negative impact of GBVH on businesses

In China, Didi Chuxing (a popular ride-sharing app) suffered reputational damage after Didi drivers murdered two female passengers in 2018. The hashtag #DeleteDidi trended on social media and the Chinese authorities ordered the company to suspend some of its services. Didi subsequently invested heavily in improving safety, but reportedly lost $1.6 billion in 2018.[41]

In the Democratic Republic of Congo, research found that "beer promotion girls" hired by Heineken to boost sales were being sexually harassed by customers and staff at Bralima, the company's Congolese subsidiary. As a result of the scandal, several of the company's partners suspended cooperation, including Dutch ASN Bank, which cut all financial ties.[42]

2.2.2 / Productivity and health and safety

The physical and mental health effects of GBVH on individuals can result in poor performance at work. Risks to businesses include:

- **Increased absenteeism and presenteeism:** A worker experiencing GBVH may need to take time off work to recover from injury or to attend medical appointments. Workers may also take time off to avoid someone who is harassing them in the workplace or on their commute. A worker experiencing GBVH may also be distracted by pain or emotional distress, which can affect their concentration and diminish the quality of their work. Each of these factors can reduce company productivity.

> In Cambodia, a study by CARE found that workplace sexual harassment costs the garment sector an estimated $89 million a year due to staff turnover, absenteeism and presenteeism. Presenteeism incurred the highest cost, with an estimated 13.5 per cent of workers saying sexual harassment meant they worked less effectively.[47]

- **Difficulty securing workers for shifts:** A worker who is concerned about GBVH on their commute may refuse certain shifts, for example, if they think the risks of violence and harassment are higher after dark, when fewer people are around or when transport options are limited. A worker may also refuse certain shifts to protect themselves from having to spend time with someone who is harassing or threatening them at work. Challenges in resourcing certain shifts can hinder a company's ability to meet deadlines.

- **Reduced health and safety:** GBVH is an important occupational health and safety issue. Distracted workers are more likely to cause accidents, which can pose wider health and safety risks for other workers, as well as community members and service users. ILO Convention No. 190 calls for GBVH to be taken into account in the management of occupational health and safety.

Examples of national legislation that requires companies to take action on GBVH

National legislation on GBVH varies significantly. According to the World Bank's database on Women, Business and the Law, 59 countries have no laws on sexual harassment in the workplace, though many have at least some GBVH legislation in place.

In some countries, companies can be liable for damages if they have not taken adequate steps to address GBVH and protect their workers, local communities and service users. Around 70 percent of countries have laws on sexual harassment at work, including:[43]

India, where the Sexual Harassment of Women at Workplace Act (2013) carries penalties for employers who do not discharge their responsibilities under the law. These include having trained, skilled and competent personnel for handling complaints, defining a time-bound complaints process, ensuring the confidentiality of information, taking measures to protect individuals from retaliation, offering counselling or other support where needed and assisting complainants who opt for criminal proceedings.[44]

Greece, where law 3896/2010 reversed the burden of proof from the alleged victim to the alleged perpetrator. Now, the employer, rather than the employee, has to prove that no sexual harassment took place. This reverse burden of proof does not apply in penal proceedings.[45]

Brazil, where Supreme Federal Court case law has been used to hold employers civilly liable for the acts of employees who physically or sexually harass their colleagues when employers have not taken adequate protective measures.[46]

⬤ GBVH, absenteeism and productivity

In 2019, an IFC study of nine of the largest companies in the Solomon Islands found that domestic and sexual violence negatively impacted employee health and wellbeing, as well as the bottom line. The violence affected employees' ability to get to work, stay safe at work and be productive at work.

Employees were either absent or less productive as a direct result of the violence they were experiencing; they were frequently tired or unwell, had difficulty concentrating, or were trying to avoid situations where they were at risk of violence.

Unstructured workplace responses to the violence meant that colleagues and supervisors spent considerable time attempting to support employees affected by violence without effective guidelines.[48]

Respectful Workplaces: Exploring the Costs of Bullying and Sexual Harassment to Businesses in Myanmar was produced by IFC's Gender Secretariat in partnership with the DaNa Facility. It contains the findings of the Respectful Workplaces Study conducted to determine the prevalence and cost of bullying and harassment in the agribusiness, finance, retail and tourism sectors.

The report offers business leaders an opportunity to understand employees' experiences of bullying and sexual harassment in Myanmar workplaces. It provides a set of practical recommendations for business leaders, human-resource managers, employees and other interested parties to create workplaces that are safe and free from bullying and sexual harassment.[49]

Source: IFC

2.2.3 / Access to skills and talent and worker retention

GBVH – or the fear of it – can affect the decisions people make about where they work, when they work and with whom they work. This is all the more likely as information on workplaces becomes increasingly accessible through social media. Risks to businesses include:

- **Difficulty recruiting new staff:** Experiencing GBVH during a recruitment process – for example, if an interviewer makes sexual jokes or comments – can result in a candidate turning down an employment offer. Potential applicants may choose not to apply for a post because the company is rumoured to tolerate GBVH. Such allegations can prevent companies from accessing the skills and talent they need and force them to invest in additional recruitment exercises.

- **Difficulty upskilling and promoting existing staff:** A company employee experiencing GBVH may choose roles that limit their contact with the perpetrator. For example, they may turn down promotions to avoid spending more time with a colleague who sexually harasses them or avoid training sessions 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 that would require them to interact with new people. As a result, companies can find it difficult to develop staff skills, to promote staff or to roll out training on new ways of working.

- **Increased staff turnover:** People dealing with the physical and mental effects of GBVH may be unable to cope at work and decide to leave their job. An employee may decide to resign to avoid working alongside their harassers, while an employee experiencing domestic violence may be forced to quit their job by a controlling partner. As a result, companies can see a rise in staff turnover, lose skilled staff, experience disruption to projects and schedules and incur additional costs for recruitment and training.

📖 Further IFC reading on the business case for addressing GBVH

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.[50]

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.[51]

The Impact of Domestic and Sexual Violence on the Workplace in Solomon Islands presents findings from a survey of employees from nine companies on how domestic violence affects them at work.[52]

✓ IFIs' increased focus on GBVH

IFC's Performance Standards (PS) have been widely adopted or adapted by other IFIs and influence how commercial banks and private equity funds undertake investments. The need to address GBVH is largely implicit, but awareness of its importance is growing. The EBRD's Environmental and Social Policy and Performance Requirements (PR), which came into effect in 2020, make explicit reference to preventing and addressing GBVH. Specifically, PS2/PR2 on Labour and Working Conditions and PS4/PR4 on Community Health, Safety and Security contain relevant requirements. Please see Annex 5 for additional guidance on incorporating these requirements into environmental and social impact assessments (ESIAs).

PS2/PR2 on Labour and Working Conditions requires:

- The employment relationship to be based on the principles of decent work, equal opportunity and fair treatment that does not discriminate. Provisions should be made for a safe and healthy work environment with measures to prevent and address harassment, intimidation and/or exploitation, including any form of gender-based violence.

- Worker accommodation to be provided in a manner consistent with the principles of non-discrimination and equal opportunity. This includes safeguards against sexual harassment and other forms of gender-based violence.

- An effective grievance mechanism for workers to raise workplace concerns. This needs to include provisions for confidential complaints and those requiring special protection measures, such as reports of gender-based violence.

PS4/PR 4 on Community Health, Safety and Security requires:

- Evaluation of health, safety and security risks and impacts on communities, including risks stemming from worker influx, and the establishment of preventative and control measures, with particular attention to vulnerable groups.

- Assessment of risks posed by security workers, checking that 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.

- Clients to assess project-related gender-based violence risks of sexual harassment, sexual exploitation and abuse to project-affected persons and communities. Where appropriate, clients will adopt specific measures to prevent and address these risks, including the provision of confidential channels for reporting incidents and providing support.

By preventing GBVH and responding appropriately to reports, companies and investors can:
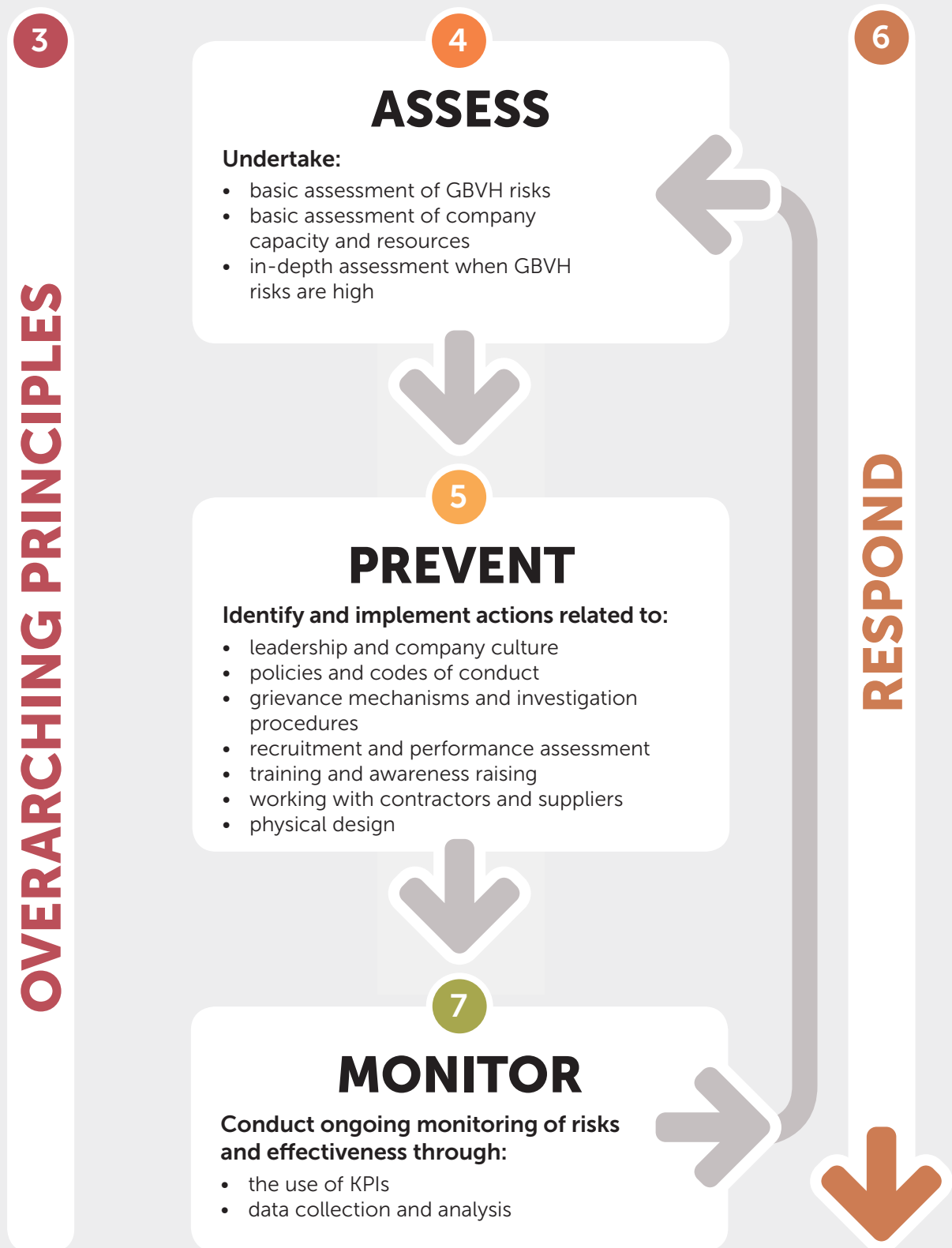
- ☑ Reduce the negative impact of GBVH on individuals and avoid the risk of costly litigation and pay-outs.
- ☑ Improve relations with local communities and strengthen loyalty and trust among service users.
- ☑ Boost the confidence of potential investors and partners, increasing access to markets and finance.

- ☑ Have a positive impact on company culture and the working environment. Workers who feel safer and respected are likely to have better morale, with positive effects on productivity.
- ☑ Reduce absenteeism and improve workers' concentration and performance at work, with a positive impact on profits and returns for investors.

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

PART B /
Assessing, preventing, responding to and monitoring GBVH

Figure 5 / The process of assessing, preventing, responding to and monitoring GBVH

OVERARCHING PRINCIPLES

3

4

ASSESS

Undertake:
- basic assessment of GBVH risks
- basic assessment of company capacity and resources
- in-depth assessment when GBVH risks are high

5

PREVENT

Identify and implement actions related to:
- leadership and company culture
- policies and codes of conduct
- grievance mechanisms and investigation procedures
- recruitment and performance assessment
- training and awareness raising
- working with contractors and suppliers
- physical design

7

MONITOR

Conduct ongoing monitoring of risks and effectiveness through:
- the use of KPIs
- data collection and analysis

6

RESPOND

3 /
Overarching principles

Key objective: *Understanding the principles that need to underpin all efforts by companies and investors to safely and effectively assess, prevent, monitor and respond to GBVH*

The assessment, prevention, monitoring and response measures presented in Part B of this guidance need to be underpinned by a number of fundamental principles in order to avoid doing more harm. Measures need to be:

- **Survivor-centred:** The rights of GBVH survivors need to be consistently prioritised and used as the starting point for all decisions on efforts to assess, prevent, monitor and respond to GBVH. Maintaining confidentiality and checking with whom survivors want information to be shared are important aspects of a survivor-centred approach. Treating survivors with dignity and respect is something that needs to be reinforced during the course of assessment and prevention efforts, including training and awareness-raising activities (see Section 5). When responding to reports of GBVH, it is important to listen to and respect survivors' wishes and decisions in order to help their recovery (see Section 6 for more). In cases where the survivor is under the age of 18, the Convention on the Rights of Child stipulates that "the best interests of the child" should be the primary consideration when taking any decisions or providing support.[53]

- **Safe:** Survivors, witnesses and those who report and seek to address GBVH can be at risk of retaliation, including threatening and violent behaviour, often from those who do not like their position of power being challenged. The threat of retaliation may be used to silence those who speak out about GBVH. This can leave those who report GBVH in a vulnerable position and fear of reprisal can deter people from reporting incidents or raising concerns. It is important that companies and investors prioritise the safety of those who have experienced, witnessessed and/or reported GBVH. Confidentiality and checking with survivors and witnesses about sharing identifiable information are important aspects of ensuring safety.

> ⚠️ **Recognise that the stakes are high**
>
> For those who speak out against GBVH, the stakes can be extremely high and, in some cases, life-threatening – something companies and investors will want to bear in mind. Responding safely to reports of GBVH can be particularly challenging in resource-poor settings, where support services for survivors may be limited or non-existent. In these situations, the risk of causing further harm to survivors can be great. Companies and investors must recognise that:
>
> - Companies should show thought, care and sensitivity in their interactions with survivors, respect their wishes 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 prevention and response measures all at once. It is far better to take considered action than to rush and risk making things worse. Investors should refrain from pressuring companies to act without sufficient thought or consideration.
>
> - Investors and companies can benefit from working with individuals and organisations with GBVH expertise to implement prevention and response measures in a safe and effective way.

- **Context-specific:** All measures need to be rooted in a thorough understanding of the local context. Investors and companies are often well intentioned and keen to act to prevent and respond to GBVH, but they can make a situation worse if they do not first understand the legal and social context and identify the support mechanisms that are in place (for example, GBVH-specific counselling and medical care). Companies and investors will want to ensure that their assessment, prevention, response and monitoring protocols are appropriate and realistic to the local context.

- **Collaborative:** Seeking inputs from a range of internal and external stakeholders can increase the likelihood of broader buy-in and make GBVH prevention efforts more effective. A collaborative approach can also improve understanding of GBVH risks within companies and among investors, as well as those they work with, including business partners, suppliers, representatives of local communities and service users. This can promote learning and the sharing of ideas so that measures are more effective. Companies and investors can draw on local health and support services or community-based organisations for additional expertise.

- **Inclusive:** It is important for companies and investors to recognise the heightened risks of GBVH faced by certain groups who are subject to discrimination and marginalisation. Higher-risk groups vary according to location and context, but often include people with disabilities, those working in prostitution, people raising children on their own, migrants or ethnic minorities, and sexual and gender minorities. These groups may be less likely to have access to information or support mechanisms. For example, illiterate or non-literate people may not access written information on GBVH reporting mechanisms.

- **Integrated:** Addressing GBVH is not a one-off exercise that can be separated from "normal" business. Rather than creating separate systems or processes, efforts to assess, prevent, monitor and respond to GBVH need to be integrated as much as possible into existing processes and management systems, such as occupational health and safety, security management systems, environmental and social management systems (ESMS) and human resources (HR) policies and procedures.

- **Non-discriminatory:** All survivors need to be listened to and treated equally. Once aware of GBVH risks, companies could mistakenly think that it is easier to avoid working with people who might be considered more likely to perpetrate GBVH, or those at greater risk of experiencing it. This thinking may be more likely in organisations that already lack diversity. Such an approach would be counterproductive to wider efforts to promote inclusive, diverse and effective businesses. As a prevention effort, promoting diversity is an important aspect of reducing GBVH risks.[54]

- **Well-informed:** Companies and investors will need to draw on relevant expertise when developing prevention and response measures. This is particularly important when grievance mechanisms and investigation procedures are being set up in order to ensure they are appropriate, relevant and safe in the local context. GBVH expertise will also be needed for in-depth assessments when GBVH risks are identified as high. Various combinations of GBVH, child protection and legal expertise will also be needed to safely respond to reports of GBVH and any investigations will need to be conducted by fully trained investigators.

4 /

Assessing GBVH risks, company capacity and resources

Key objective: *Understanding how to screen operations, projects and investments for GBVH risks, assess company capacity and resources to prevent and respond to GBVH and know when to seek expert support*

GBVH risks will be present in every country and in all organisations. However, the level of risk will vary from country to country and from company to company, depending on their activities and operations. GBVH risk levels can even vary from one worksite to another within the same company. It is, therefore, important that companies and investors understand the GBVH risks associated with individual investments, projects and operations. It is also important to assess company capacity and resources to prevent and respond to GBVH and to understand the social and medical support services and community resources available.

There are certain measures all companies will want to take, regardless of risk level, such as having appropriate policies and grievance mechanisms in place. However, GBVH risk assessments will enable companies and investors to understand the GBVH risks associated with their operations and the context in which they are working. Assessing these risks will help companies to introduce tailored measures that are more effective. For investments, projects and operations identified as being high risk for GBVH, further prevention and response measures can be put in place. A summary of the various types of assessments is outlined in figure 6 below.

✅ The difference between GBVH risks and GBVH reports

It is important to make a distinction between:

- **GBVH risks** – the possibility that GBVH may be perpetrated

  and

- **GBVH reports** – specific GBVH incidents or concerns that have been raised.

Companies and investors need to implement a combination of proactive measures to prevent GBVH happening in the first place and to encourage incidents to be reported, and reactive measures to respond and mitigate impact when reports are made.

Figure 6 / Identifying GBVH risks and assessing company capacity and resources

Basic assessment of GBVH risks based on country context and investment activities/company operation (see example indicators in Annex 1)

⬇

Basic assessment of company capacity and resources to prevent and respond to GBVH (see example questions in Annex 3)

⬇

In-depth assessment of GBVH risks where risks are high and capacity and resources to prevent and respond are weak (see example approach in Annex 4)

Each of these elements can be integrated into company and investor processes early in an investment or project lifecycle. It is never too late, however, and the elements outlined in Figure 6 can be undertaken at any point.

4.1 / Basic assessment of GBVH risks

Investors can incorporate GBVH risks into wider risk screening at the concept or proposal review stage and, where necessary, assess them in greater depth during appraisal or due diligence. It is important that GBVH risks are considered as early as possible in ESIAs (see Annex 5). Companies can integrate such efforts into their scoping and feasibility assessments or design phases. If operations are already underway, they can fold them into ongoing implementation and monitoring processes.

> ⚠️ **Do not ask about individual experiences of GBVH**
>
> It is important that efforts to identify GBVH risks do not include attempts to identify people who have experienced or witnessed GBVH, be they community members, workers or service users. No one should be asked any direct questions about GBVH or their experiences of it. This is not only unnecessary, but may cause harm or distress by re-traumatising people who have survived or witnessed GBVH.

4.1.1 / Risk factors related to country context

Country context can increase GBVH risks for an investment, project or operation. GBVH risks tend to be higher where:

- **gender inequality** is high, with widespread discrimination against women, causing vulnerability to exploitation and a lack of resources to seek help
- **gender stereotypes** are strong, in particular, the widespread belief that men are naturally aggressive and justified in perpetrating GBVH, which allows it to be perpetrated without challenge
- **intimate partner violence** is widespread, which indicates an elevated risk of other forms of GBVH too
- **national legislation** on GBVH is weak or entirely lacking, or existing laws are weakly enforced, meaning perpetrators of GBVH can act with impunity
- **poverty and discrimination** are high, increasing people's vulnerability to exploitation and restricting their access to information and resources to seek help

- **corruption** among local authorities is widespread, including among government officials, the police and security services, reducing action against GBVH and enabling perpetrators to act with impunity
- **fragility and conflict** exists, which weakens the rule of law and often increases other GBVH risk factors.

4.1.2 / Risks factors associated with an investment, project or operation

Certain features of an investment, project or operation can also affect levels of GBVH risk, in addition to those associated with the country context. GBVH risks tend to be higher where:

- **a large new male workforce** and/or an influx of workers is required, whose relatively high income may create opportunities for sexual exploitation of people in the local community
- **there is a need for temporary, informal and/or migrant workers**, who may be cut off from their support networks and be more vulnerable to GBVH and less likely or able to report it. Conversely, potential perpetrators may also go unidentified due to lack of background checks on temporary and informal workers
- **seasonal deadlines are commonplace**, with heavy fluctuations in workload, where managers and supervisors resort to verbal harassment and physical violence as ineffective attempts to increase workers' productivity
- **transportation of goods** over long distances and overnight through remote communities is required, where drivers may perpetrate or themselves be vulnerable to GBVH
- **community engagement in greenfield projects** is required, particularly in poor communities, where individual workers have decision-making power over access to resources, creating opportunities for sexual exploitation
- **services are provided**, especially luxury services or highly sought-after basic services, where workers can perpetrate or be vulnerable to GBVH
- **security personnel** are used who are meant to provide protection but who may abuse their positions of power and status to perpetrate GBVH, particularly where they have access to areas where workers sleep.
- worksites are in **remote locations**, increasing the risks of sexual or physical abuse out of sight of others and where people have limited access to resources to report GBVH and receive support.

Companies and investors will need to select indicators to help determine the level of GBVH risk for their investments, projects and operations. Annex 1 provides examples of indicators for each of the risk factors outlined above, both those relating to the country context and those associated with the investment, project or operation itself. Annex 1 also lists potential sources of information against each of the suggested indicators and provides a more detailed explanation of why each of the factors are associated with elevated levels of GBVH risk.

✅ Increased GBVH risks due to environment and climate change

The adverse impacts of climate change disproportionately affect disadvantaged groups and increase their exposure and vulnerability to GBVH. Women in many societies have limited legal rights, including land rights, and are heavily reliant on natural resources for their livelihoods. The effects of global warming and destruction of the natural environment can have a particularly severe impact on women's livelihoods and can increase their vulnerability to sexual exploitation.[55] Natural disasters such as floods, droughts and landslides, climate-induced scarcity of natural resources and climate-induced migration are all environmental factors that can exacerbate women's already vulnerable status and increase their exposure to GBVH risks.

For further information see Gender-based violence and environment linkages by the International Union for the Conservation of Nature.

✅ Increased GBVH risks due to health emergencies

Health emergencies, including epidemics, can increase the risk of GBVH in both the immediate and longer term. Research into outbreaks of Ebola Virus Disease in West and East Africa, as well as other infectious-disease outbreaks in Asia, including Severe Acute Respiratory Syndrome (SARS) and Middle East Respiratory Syndrome (MERS), shows a demonstrable rise in the levels of GBVH. There has also been a reported increase in the perpetration of GBVH as a result of the COVID-19 pandemic.

There are a number of reasons why health emergencies heighten GBVH risk, including:

- Measures aimed at curbing the spread of infectious disease, such as social distancing, curfews and changed working practices, can create isolated public and workspaces, where violence and harassment are less likely to be witnessed by others.

- The urgency and focus required to address a health emergency can lead to a real or perceived disruption to the functioning of GBVH reporting mechanisms, discouraging survivors and witnesses from coming forward.

- School and workplace closures, along with the emotional and financial insecurity caused by health emergencies, can heighten tensions within the home, triggering increased levels of domestic violence.

- Scarcity of resources, widespread unemployment and increased poverty levels as a result of health emergencies can increase people's vulnerability to sexual exploitation, as they become increasingly desperate for access to basic services and economic survival.

For further information, please see Pandemics and Violence Against Women and Children by the Center for Global Development.[56]

👁 Using indices to identify country-specific GBVH risk

Instead of (or as well as) using the type of country-context indicators listed in Annex 1, companies and investors can use an index to give a broad indication of the level of GBVH risk in a given country.

The Women, Peace and Security (WPS) Index developed by Georgetown University pulls together data from a large number of indicators, capturing three dimensions of women's lives: inclusion, access to justice and security, including data on violence. Rankings are updated every two years.

The annual Global Gender Gap Index, developed by the World Economic forum benchmarks national gender gaps in terms of economic participation and opportunity, education, health and political empowerment, including data on gender-based violence.

➡

4.2 / Basic assessment of company capacity and resources

It is important to understand whether a company has the capacity and resources to prevent GBVH from happening in the first place, to encourage and enable GBVH to be reported when it does happen and to respond to reports when they are made. Investors can incorporate this assessment into their appraisal and due diligence processes. Companies can conduct capacity and resource assessments in the project or operational design phase or include them in ongoing internal processes.

There are a number of aspects of company capacity and resources that will need be assessed:

- company leadership, to motivate and oversee action and to establish a positive organisational culture which encourages reporting

- company policies to publicly state commitments and codes of conduct to clarify expected and prohibited behaviours

- grievance and investigation mechanisms to enable reporting and follow-up

- transparent recruitment and performance assessment systems to reduce opportunities for GBVH

- training and awareness raising activities to motivate attitude and behavioural change

- efforts to work with contractors and suppliers to prevent and respond to GBVH

- design of physical spaces to increase safety and reduce opportunities for GBVH to be perpetrated.

A lack of capacity and resources in any of these areas could increase GBVH risks and leave companies ill-equipped to respond effectively (see Section 5 for more information). Annex 2 provides further guidance on each of the capacity and resource areas listed above, proposing a phased approach that companies can adopt. Annex 3 provides a list of questions that can be used by investors and companies to assess whether basic capacity and resources are in place as part of initial efforts to prevent and respond to GBVH.

4.3 / In-depth assessment of GBVH risks

An in-depth assessment of GBVH risks may be needed where companies and/or investors identify:

- high levels of GBVH risk (for example, through a basic assessment of GBVH risks using indicators such as those in Annex 1)

- gaps and weaknesses in company capacity and resources to prevent and respond to GBVH (for example, through a basic assessment using the questions in Annex 3).

An in-depth assessment of GBVH risks will need to be conducted by a GBVH expert to ensure it is carried out in a sensitive, safe and ethical way. Local or national women's rights organisations, NGOs and international organisations with local or national offices can be a good source of GBVH expertise for in-depth assessments. In many countries, experts working for these organisations may lack experience of the private sector. If so, they could be paired with someone who has knowledge of private sector operations, ideally from the industry or sector in question. Working with a local GBVH expert can allow the firm to establish a source of ongoing support, boosting their capacity to address GBVH over the longer term.

> ⚠️ **Recognising in-depth assessments require GBVH expertise**
>
> If it proves difficult to secure a GBVH expert to carry out an in-depth assessments of GBVH risks, it is better to wait rather than have one carried out by someone who lacks the requisite skills and experience. In-depth assessments of GBVH risks are very different to the basic assessments of GBVH risk outlined in Section 4.1. If an in-depth assessment is conducted by a non-expert, it can cause serious harm and/or distress to survivors and increase GBVH risks for them and for others.

> 👁️ **Using indices to identify country-specific GBVH risk**
>
> The SDG Gender Index, developed by Equal Measures and partners, measures the state of gender equality and is aligned to 14 of the 17 SDGs. The annual index includes 51 issues including health, gender-based violence, decent work and others.
>
> The Gender Social Norms Index, developed by the United Nations Development Programme (UNDP), uses data on attitudes towards gender and their impact on social and political life.

5 /
Preventing GBVH and encouraging reporting

Key objective: *Understanding key areas of GBVH prevention, how they interrelate and the importance of an integrated approach*

Assessing GBVH risks (as described in Section 4) will enable companies to tailor prevention efforts in a way that is relevant and appropriate to the nature of the business and the local context in which it is operating. However, an assessment of GBVH risks does not determine whether basic prevention efforts are required; all companies need to take some action to prevent GBVH and to be prepared to respond to reports.

Prevention efforts should be proportionate to company size, as well as the scale and complexity of the GBVH risks identified. Wherever possible, it is preferable that

Figure 7 / Seven key areas where companies can work to prevent GBVH

Leadership and company culture
Section 5.1

Policies and codes of conduct
Section 5.2

Grievance mechanisms and investigation procedures
Section 5.3

Recruitment and performance assessment
Section 5.4

Training and awareness raising
Section 5.5

Working with contractors and suppliers
Section 5.6

Physical design
Section 5.7

GBVH prevention efforts be integrated into existing systems and procedures, rather than duplicated in separate processes. It is important to view efforts to prevent GBVH as part of wider efforts to address gender inequality and discrimination in the workplace[57] and to promote positive and respectful relationships with local communities and service users.

The following subsections provide guidance on and illustrate best practice for each of these seven areas. Annex 2 provides further guidance on a phased approach that companies could adopt, with an initial focus on getting the basics in place for each area.

5.1 / Leadership and company culture

Commitment to address GBVH by a company's board of directors and senior management helps to drive changes in company culture, so that GBVH is not tolerated and workers feel comfortable and supported in raising concerns. It is important for leaders to model positive behaviour and publicly demonstrate their company's commitment to preventing GBVH, to build confidence that complaints will be taken seriously.

Companies can take practical steps to strengthen their leadership and culture.

1. **Understand the company's GBVH risks and how they can be integrated into the risk management system.** To prevent GBVH, senior management and executives need to be aware of the risks and their role in addressing them. It is also important that leaders understand legal commitments and requirements to inform their prevention and response efforts (see Annex 1).

2. **Allow time for senior management buy-in to address GBVH and develop a supportive organisational culture.** While a great deal of effort is often put into policies and procedures, addressing GBVH requires sustained commitment. Changes to an organisational culture can take time. Ways to strengthen organisational leadership and company culture include:

   – **identifying reputational incentives for change**. Recognition of workers who make efforts to address GBVH and have adopted good practices. Company reward/award schemes or praise in meetings, for example, can help encourage others to change their behaviour.

   – **establishing a top-tier focal point** tasked with driving change, as well as other individuals who can play an important role in preventing and

Investor opportunities to encourage and enable action on GBVH

Investors can encourage companies to take action on GBVH in a number of ways. Their influence tends to be greatest early in a commercial relationship, when they can integrate specific, time-bound actions into investment agreements in the form of legally binding environmental and social or gender action plans. Investment agreements can tie disbursements to the implementation of agreed preventative actions, requirements to report serious incidents of GBVH to investors and the use of KPIs (see Section 7 for more).

Investors can exercise leverage through their ownership relationship and use corporate engagement, voting rights and other mechanisms at their disposal to push for improved systems and processes. Where investors have less influence, because of the short-term nature of the investment or where direct project finance already underway, it can be helpful to focus on:

- capacity-building to encourage and enable companies to address GBVH

- helping to broker partnerships between companies and local organisations, encouraging companies to draw on existing expertise to address GBVH

- raising GBVH risks as an issue associated with existing company priorities, such as occupational health and safety

- raising GBVH risks in relation to broader gender risks and the costs to business of gender inequality (for example, in relation 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 during policy dialogue and when developing country strategies, so that a consistent set of expectations is presented to the company.

One of the most effective ways of encouraging company action, however, is to discuss with them the benefits of addressing GBVH. Companies that address GBVH stand to benefit in numerous ways and this is a strong motivating factor (see Section 2 on the business case for addressing GBVH).

responding to GBVH. Focal points should demonstrate an interest in addressing GBVH and the role should be included in their scope of work and performance objectives. Focal point activities can include maintaining awareness of company GBVH risks, leading communication with workers and external stakeholders and coordinating outreach to communities and service users.

- **tracking progress and improvement**, for example, by including explicit sections on GBVH in company annual reports and making GBVH a standing agenda item at senior management and board meetings. Some companies may find it helpful to assign a board-level committee[58] to provide oversight on GBVH and/or a committee which reports to the Board to provide updates on efforts to prevent and respond. In India, for example, organisations with more than 10 employees are required[59] to file an annual report of the number of sexual harassment complaints received, addressed and pending for more than 90 days. Organisations are also required to create 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 behaviour that is expected of workers, subcontractors and suppliers are most likely to be effective (for example, "we support a safe and harassment-free workplace for all"). Such messages can also emphasise the importance of reporting incidents and how to do so. The use of multiple communications methods (for example, staff meetings, newsletters, emails and posters) can help reach all workers, community members and service users (see Section 5.5 for more).

4. **Identify and establish mutually beneficial partnerships with stakeholders that can provide GBVH support**, including local and national organisations with knowledge of and expertise on GBVH and an understanding of the local culture and context. By working with these organisations, companies can gain long-term access to the GBVH-related support and services its workers, service users and local communities may need. In return, local organisations can benefit from improved capacity. These partnerships are best embedded in risk management processes and reviewed and revised regularly. For example, local organisations can help to:

– design and deliver community awareness-raising activities and company GBVH training

– provide support to workers and community members who have experienced GBVH, for example, through health services, counselling or legal support

– identify support groups at higher risk of GBVH in a particular context, for example, migrant workers, disabled people, children and LGBTQI+ groups.

> ### 💡 Identifying organisations to provide GBVH support
>
> When identifying suitable local or national organisations to work with on GBVH and to establish mutually beneficial partnerships, key questions can include the following:
>
> • What 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 and do they only work with certain groups?
>
> • Is there any indication of the quality of their work?
>
> • Do they have capacity to take on new work?
>
> • Are there any confidentiality considerations?
>
> • What is their relationship with local communities?
>
> For examples of and tools on how to conduct a mapping of services for GBVH, please see UN Women's Conducting a Service Mapping Exercise.

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, sexual orientation, gender identity and other characteristics) tend to have a lower risk of GBVH, particularly sex-based harassment in the workplace.[60]

6. **Allocate sufficient budget for prevention, the encouragement of reporting and report response**. Addressing GBVH can require investment, but can save companies money in the long run when effectively spent (see Section 2 on the business case for tackling GBVH).

👁 Examples of supporting women's agency and fostering a safer company culture

Solomon Islands – The Waka Mere Commitment to Action has been a two-year initiative to improve business outcomes in the Solomon Islands by advancing workplace gender equality. The initiative has contributed to a shift in employees' perceptions of safety and fairness at work, has catalysed companies to adopt new policies and practices and to invest in future female leaders, and has opened up skills training and jobs for women in roles traditionally held by men.[61]

India – CDC is supporting an Indian end-to-end logistics company in providing employment opportunities to a greater number of women. It is enhancing workplace safety and inclusivity through a series of gender-focused activities, including a gender diagnostic, gender strategy and gender action plan. These activities are helping the company to:

• Establish the business case for women's employment, including the development of indicators to establish a baseline of women's representation and return on investment.

• Undertake gender-smart recruitment, progression and promotion to realise female employee targets agreed by the company and CDC. This will include jointly developing strategies to achieve female recruitment targets for senior and middle management, after safeguarding measures have been instituted.

• Rebalance women's engagement towards employment and away from contracted roles. This includes commissioning a consultant to undertake an in-depth gender diagnostic to establish strategies to address women's disproportionate concentration in contract roles, moving them instead into employee status, with protections and benefits.

• Establish gender-sensitive policies and practices (including GBVH policies and grievance mechanisms) to attract, recruit, retain and progress women at all levels of the workforce to be a best-in-class employer for women.

• Establish measures to build a safe and inclusive workplace, including but not limited to the provision of adequate gender-sensitive facilities and infrastructure, such as female changing rooms and toilets.

• Develop and implement training on grievance mechanisms so GBVH can be reported.

• Establish an impact measurement and monitoring system to track progress against the company's Gender Action Plan over time, to quantify the business case and drive continual improvements.

Sources: CDC and IFC

7. **Take further action to prevent GBVH, demonstrating leadership beyond the company**. Companies that have taken steps to prevent GBVH may wish to share their learning and experience with others at national, sectoral or industry levels. This can involve working with trade unions, women's rights organisations, other companies or business associations, and cooperating with state institutions, particularly health and security departments. Sharing learning in this way can improve a company's reputation on GBVH among communities, service users, potential partners and investors.

📖 *Further reading for guidance on promoting diversity and inclusion in the workplace*

EBRD Environmental and Social Policy, Performance Requirement 2 on labour and working conditions, non-discrimination and equal opportunity[62]

Advancing Gender Diversity through Effective Anti-Harassment Mechanisms, an IFC case study on HBL Banking and Financial Services, Pakistan[63]

Measure & Improve Your Labor Standards Performance: Performance Standard 2 Handbook for Labor and Working Conditions by IFC[64]

Guide to support the implementation of the Global Women's Safety Framework in Rural Spaces, UN Women/Unilever guidance for the agribusiness/tea sector[65]

👁 Examples of action in response to GBVH assessments

West Africa – Once a GBVH assessment had been completed for an energy project, the company agreed to fund the salaries of two GBVH specialists working for an NGO near the project site. The specialists are responsible for managing community GBVH education programmes, building the capacity of service providers in the project area, managing reports and cases of GBVH, and providing training and additional support to the company.

Eastern Europe – A project to support upgrades to public transport underwent a GBVH assessment. In response, the company agreed to develop a new sexual harassment policy and support contractors in developing a code of conduct. The company is identifying key focal points, who will be trained to receive and respond to allegations of sexual harassment in the workplace.

Source: IFC

👁 Example of how to build HR capacity to address GBVH and promote gender equality

Turkey – The EBRD is helping electrical distribution and retail firms Trakya Electric Distribution Corporation (TREDAS) and Trakya Electric Retail Sales Corporation (TREPAS) to improve their HR practices to address GBVH and promote gender equality. Starting with a review of HR practices, the companies trained more than 800 staff on preventing GBVH and took action to improve work-life balance and equal opportunities. The number of women employed in technical roles has increased by 21 per cent. In recognition of the progress made on strengthening gender equality, the HR Director of TREDAS won the "Business World Awards" in 2018.[66]

Source: EBRD

💡 Building HR capacity to support leadership efforts

HR departments or functions play an important role in making sure that measures to prevent GBVH are integrated into company processes and management structures. However, they are sometimes seen as working for management, so may not be trusted by workers. An HR function can help support company leadership to tackle GBVH by:

- addressing the risks of GBVH during the recruitment process, including checking that appropriate processes are followed in terms of job applications, interviews, vetting and background checks, contracting and inductions (see Section 5.4)

- developing and/or commissioning training and awareness-raising activities on GBVH policies and procedures

- supporting workers who experience GBVH by directing them to relevant services and ensuring they are not unfairly disciplined if the violence is affecting their performance at work

- checking that mechanisms and investigation procedures are followed appropriately and that disciplinary proceedings ensue if needed.

👁 Examples of action in response to GBVH assessment

Egypt – Part of Egypt's feed-in tariff programme is a solar-energy initiative in Benban, near Aswan, which stands to be the world's largest solar park. The project lenders include IFC, EBRD and CDC and the project site is managed by the Egyptian facility management company, Hassan Allam Services.

Following an assessment of GBVH risks, four key GBVH and broader gender-related risks were identified:

- workplace sexual harassment and bullying
- unsafe behaviour when driving to and from the project site, encouraged by gender stereotypes about how men are expected to behave
- domestic violence in affected communities
- few employment opportunities for women.

Within a year of the assessment, the clients and facility management company, with support of the lenders, undertook the following actions:

- GBVH topics were integrated into the operations and maintenance HR policies and induction trainings.
- Worker grievance mechanisms were updated to include specific measures on GBVH-related grievances, such as the appointment of a separate female contact person and special measures on confidentiality.
- Expats staying in employer-provided apartments in Aswan were required to receive code-of-conduct training and information on the grievance mechanism.
- Implementation of the gender action plan has started to be evaluated through independent audits.
- Community GBVH awareness training was added to the corporate social responsibility strategy. Two sub-projects reported the completion of GBVH training and refresher training on the code of conduct was introduced for incoming operations teams.
- Two female employees from the solar park were featured as role models by a local NGO to encourage women to apply for jobs on the site.
- Sub-projects are actively recruiting women as engineers.

Source: IFC

5.2 / **Policies and codes of conduct**

An essential way for companies to express their commitment to tackling GBVH is through company policies and codes of conduct. However, these alone cannot prevent GBVH; effective prevention requires regularly communicating policies and codes of conduct to those inside and outside the organisation and taking action to ensure they are implemented.

When developing GBVH policies and codes of conduct, companies may wish to seek input from internal and external stakeholders through trade unions and other worker groups, community organisations and service-user groups. This helps to ensure that policies and codes of conduct on GBVH are realistic and relevant to everyone who needs to use them. It can also encourage a greater sense of ownership, making them more likely to be used.

Once policies and codes of conduct are in place, regular stakeholder feedback can help identify they are working in practice and whether they need to be changed or adapted.

👁 Example of developing codes of conduct in a participatory way

Zambia – The Zambia Export Growers Association (ZEGA) developed its code of conduct as part of a collective bargaining agreement between the horticultural industry union and the Zambian Farm Employers Association. From ongoing dialogue, ZEGA added abuse, including sexual abuse, to the code and included a grievance mechanism for sexual harassment.[67]

5.2.1 / GBVH policies

Some companies choose to develop a specific GBVH policy, while others address GBVH as part of a wider set of company policies, such as those on occupational health and safety. A combination of the two can be most effective. It can be helpful to have a comprehensive standalone GBVH policy, which can be clearly communicated. At the same time, integrating GBVH into existing policies and procedures can send an important message that it is part of normal business. It can also be helpful to differentiate between policies for HR management of direct operations and those for contractor and supply-chain management through linked, but separate documents.[68]

Companies that decide to have standalone GBVH policies can choose whether to cover all forms of GBVH in a single policy or to have separate policies for specific forms of GBVH, for example, sexual harassment. Annex 6 provides a template for developing a standalone comprehensive GBVH policy, but the prompts therein can also be used to develop separate policies for various forms of GBVH and for integrating GBVH into broader polices.

5.2.1.1 / Policies on domestic violence

In recognition of the damaging impact of domestic violence on employees and their families, as well as the knock-on effects on their work (see Section 1.3.5), some companies are starting to address domestic violence in their policies and procedures. This can include information on the support that a company will provide to employees who experience domestic violence such as information on access to emergency leave, changes to worksite locations and/or shift times, financial support for medical costs or legal fees, help to access services and practical assistance with changing phone numbers or email addresses to prevent contact from perpetrators. Companies may also consider putting in place an employee assistance programme to support all staff, including those who are experiencing domestic violence. However, it is important that companies do not investigate cases of domestic violence.

5.2.2 / GBVH codes of conduct

A code of conduct is a user-friendly document that reflects company GBVH policy and provides a set of standards of acceptable conduct and behaviour. Company GBVH policies and codes of conduct will need to be aligned. Companies may want to address a variety of circumstances, stakeholders and forms of GBVH in one comprehensive code of conduct. Others may decide to develop separate codes of conduct that specifically outline expected and prohibited behaviours relating to:

- certain workers, for example particular teams or functions within the company

- external stakeholders, such as community members and/or service users

- individual forms of GBVH, for example, prohibitive behaviours that constitute sexual exploitation

- certain circumstances, for example, interactions with other workers, those in the supply chain, community members or services users.

In any case, a code of conduct needs to:

- define the term GBVH and what it covers, with specific examples of behaviour

- state the main elements of the company's GBVH policy

- outline the settings where the code applies (such as in the workplace, travelling to and from work, in employer-provided accommodation, in communications, at work-related social events, in training and travelling for work)

- provide specific guidance on how to report incidents (see Section 5.3)

- outline sanctions and disciplinary measures for violating the Code of Conduct, not only under national law, but also according to company policy and IFI requirements.

👁 Example of assistance for staff experiencing domestic violence

Turkey – More than 17 large companies from different sectors came together under the umbrella of TÜSİAD, a voluntary organisation of Turkey's leading entrepreneurs and executives, to formulate the Business Against Domestic Violence: Policy Development and Implementation Guide. The guide includes advice on how to create and implement an effective corporate policy that supports employees who are experiencing domestic violence, as well as sample policies and examples of best practice from Turkish companies.

Source: EBRD

5.2.3 / Communicating policies and codes of conduct

Once company policies and codes of conduct on GBVH have been developed, it is important to communicate them to everyone to whom they relate, so that they are understood. This will need to include people both inside and outside the company. In order to communicate GBVH policies and codes of conduct effectively, companies will need to:

- agree audiences and consider their communication requirements, including staff, contractors, truck drivers, security personnel, community members and service users

- use multiple accessible formats, including printed material, posters, leaflets and electronic links

- translate communications into local and other languages spoken by the workforce and local communities

- ensure communication is accessible to non-literate and semi-literate audiences, for example, by using pictures and verbal training or awareness-raising activities

- provide accessible formats for people with disabilities, such as Braille, audio recordings, large print or subtitles

- where appropriate, provide child-friendly and age-appropriate versions, for example, in schools

- agree the frequency of communication, which will vary by level of GBVH risk and audience.

📄 *Further reading on company policies, procedures and codes of conduct*

IFC Toolkit of Actions and Strategies for Oil, Gas, and Mining Companies for a model policy on sexual harassment, a model policy on intimate partner violence and GBV and a model code of conduct on GBV for companies, contractors and employees[69]

Working Together to Prevent Sexual Exploitation and Abuse Recommendations for World Bank Investment Projects[70] and the World Bank's Good Practice Note on GBV[71] to learn about the Bank's efforts to prevent and respond to GBV risks in the projects it supports

How Can Business Tackle GBV in the World of Work[72] for guidance, case studies and a diagnostic tool to help companies tackle GBV

Fair Wear Foundation and ILO's International Training Centre online resource kit for Gender Based Violence in Global Supply Chains[73]

Guidelines for Private Security Providers on Preventing and Addressing Sexual Exploitation and Abuse[74] for guidance on the expected behaviour of security personnel.

Companies will want to ensure that relevant policies and codes of conduct are signed by all workers, with options to indicate that they have attended training and/or have read and understood the policy and code. People should be able to request further clarification if required.

5.3 / Grievance mechanisms and investigation procedures

5.3.1 / Grievance mechanisms

GBVH is widely under-reported. It is important that people both inside and outside a company have channels through which they can report GBVH, including options to report anonymously.[75] Grievance mechanisms should be tailored to the needs of different groups, including workers, community members and service users, so multiple reporting channels are likely to be necessary. All channels used to report GBVH must be safe and confidential.

All projects receiving financing from IFIs will need to develop grievance mechanisms and, depending on the type of project, this is likely to include a workers' grievance mechanism as well as a community grievance mechanism. The grievance mechanisms should be developed to reflect the nature of the project and local community context. Possible channels that function as part of the two grievance mechanisms could include:

- For workers: independent helplines, an email address or whistleblowing line, trade-union representatives, health and safety committees. It is important that at least one channel facilitate anonymity.

- For service users and community members: complaint/feedback boxes, a toll-free telephone number, a designated community organisation, service-user group or local women's organisation. Reporting channels need to include anonymous and child-friendly options to encourage children and young people to come forward.

5.3.2 / Response mechanisms and investigation procedures

Companies need to establish a clear set of procedures to follow when a report of GBVH is made. These procedures will need to set out how reports will be acknowledged and handled, by whom and within what timeframe. Grievance mechanisms may raise issues that require investigation. Companies will therefore also need to set out clear investigation procedures, including appeal mechanisms (see Section 6.1.4). This will allow companies to take a consistent approach in dealing

with reports and investigations. It will also enable companies to clearly communicate what people should expect if and when they report GBVH. Importantly, setting out procedures will also require companies to identify the skills and expertise they need to safely respond to reports of GBVH, particularly when investigations are required.

Anyone who investigates GBVH reports needs to have been fully trained, to ensure that they have the skills to conduct such investigations safely. So they don't always need to go to a third-party provider, companies can identify members of their own staff to conduct investigations into allegations of GBVH involving employees in their workplaces. However, they will need to invest to ensure these staff members receive specialist training in conducting GBVH-related investigations. These staff will also require follow-up support from more experienced investigators in complex and/or sensitive situations. If companies opt to develop this capacity, they will need to ensure that a diverse selection of staff members undergoes this training. This will allow survivors and witnesses to express a preference when it comes to their interviewer (for example, some female survivors may prefer to speak with a woman). A range of organisations provide training for GBVH investigators.

Companies who choose not to develop in-house investigation capacity will need to find third-party providers who can conduct investigations for them. Providers of investigation services include HR firms, legal firms, specialist consultancy companies and some international NGOs. Any firm providing such services should be qualified to undertake such investigations ethically and safely, with a clear understanding of GBVH risks and what it means to take a survivor-centred approach. Working with a provider of such specialist expertise early on can help companies to design effective and appropriate response mechanisms and investigation procedures from the outset.

Even where companies have members of staff who are fully trained investigators, there are certain instances in which investigations will still need to be conducted by third-party providers. This includes reports of GBVH that:

- **Implicate senior managers.** Internal hierarchies could compromise the integrity of any investigation conducted by more junior staff.
- **Involve community members.** Investigations conducted by members of the company's staff or even external firms may not be trusted by the community, so will not be effective. An organisation with GBVH expertise and close community relationships may be a better option.

Cases involving children will also require the use of investigators with specific child-protection expertise. In certain cases, such investigations can be undertaken within the national legal framework by government child-protection services or the police.

- **Are particularly complex and sensitive.** Members of staff who have been trained to conduct investigations may lack sufficient experience to deal with cases of GBVH where the impact has been severe and/or where cases are particularly complicated.

Understanding why people do not report GBVH

For company leadership to support an organisational culture in which people feel comfortable speaking up about GBVH and feel supported in that process, it is important to first understand why people may currently feel unable to do so.

When designing new mechanisms or updating existing mechanisms, companies will need to identify the barriers people may face to reporting GBVH and develop mechanisms that help to overcome these barriers. Common barriers include:

- feeling shame and embarrassment at having to describe what has happened and that others will know about it
- feeling distress and trauma and not wanting to re-live what they have experienced
- lacking trust that the process will be handled fairly and in confidence and/or lacking confidence they will be believed
- worrying about being blamed and stigmatised for causing trouble and/or provoking the behaviour they have experienced
- for workers, having concerns about being tarred as "difficult", with a detrimental effect on their current work and potential promotions. This may even include fear they might lose their job
- knowing perpetrators will be able to count on the support of others
- fearing further violence or harassment, both in terms of retaliation by perpetrators and those who support them, and by family members who may blame them for what has happened.

Consider who is best placed to receive reports

In order for people to have confidence in reporting mechanisms, it is important to consider whether those receiving reports have sufficient seniority. The ability to report to independent grievance mechanisms is also important for companies where senior managers are involved in perpetrating GBVH (see the examples overleaf from Bangladesh and Lesotho). Trade unions and worker organisations can also be an important option for raising grievances and as a support mechanism for workers.

Making sure certain community members are not excluded

When allocating responsibilities for community relations, including to liaison officers from local communities (for community grievance mechanisms, for example), it is important to consider local power dynamics and establish reporting options that are accessible to everyone within the community.

Further reading on the development of child-friendly grievance mechanisms

UNICEF's Child-friendly Complaint Mechanisms for detailed guidance on what makes a reporting mechanism child-friendly[76]

The Keeping Children Safe resource library for more on developing child-friendly grievance mechanisms[77]

Examples of independent grievance mechanisms

Bangladesh – The Bangladesh Accord is a legally binding agreement between global brands, 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 about issues including workplace violence and be protected against retaliation.[78]

Lesotho – An independent grievance mechanism has been created to tackle sexual harassment in Lesotho's textile factories, funded by the United States Agency for International Development and implemented by the Solidarity Center. The oversight body has the power to investigate claims and compel factories to discipline or dismiss offenders.[79]

Annex 6 lists considerations for creating safe, accessible and effective grievance mechanisms and investigation procedures for GBVH. Companies will need to tailor their approaches to the context in which they are operating and the nature of their business. Some companies may prefer to update existing grievance mechanisms and investigation procedures to address GBVH, rather than create new ones.

Companies will need to seek legal advice and GBVH expertise when designing grievance mechanisms and investigation procedures, as it is important to understand national legal frameworks and how these may affect legal obligations and decision-making. It is important that investigation procedures are aligned with national legal frameworks. 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 to believing complainants while also ensuring due process and discouraging false reporting?

- What are the practical considerations in terms of timeframes for filing a grievance? Ideally there should be no limit on the timeframe – this will provide an opportunity for GBVH cases dating back many years to be heard.

- Is it clear what specialist skills may be needed, for example, GBVH expertise, child-protection expertise, or people with specific knowledge of the needs of certain groups, such as those with a disability?

- What local organisations and worker representatives can support survivors? These can include health services, psychological support and legal advice.

Even with formal grievance mechanisms in place, any worker can potentially receive a report of GBVH. Consequently, all workers will require guidance on how to receive a report, with clear instructions on what to do next, the limitations of their role and their responsibilities in promptly referring a report to the appropriate person.

Technology and digital tools are increasingly being 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 the risks and opportunities of digital tools, as outlined in Table 7. Even with digital tools, companies will still need to have robust procedures in place for responding to reports when they come in.

👁 Examples of digital tools for reporting GBVH

EthicsPoint™ is a confidential online and phone-based reporting system. Anyone with concerns about abuse or misconduct in the workplace can file an anonymous report.

MySafeWorkplace® is a third-party reporting system. People can report concerns about GBVH or other ethical violations by phone or online.

⚠ Adapt to the needs and wishes of survivors

The most important element of any GBVH grievance mechanism or investigation procedure is that it focuses on the safety and wellbeing of survivors. Grievance mechanisms and investigation procedures have to be flexible, so that they can respond appropriately and in line with the wishes of GBVH survivors (see Section 6).

⚠ Encourage people to come forward

Some individuals may think that grievance mechanisms should only be used to report the most severe forms of GBVH. It is important that workers, community members and service users are made aware that they should use grievance mechanisms to report *all* types of GBVH concerns.

Table 7 / **Opportunities and risks of digital reporting for GBVH**[80]

Opportunities	Risks
• Some users may be more comfortable reporting through digital channels. • Digital channels potentially offer greater anonymity. • Digital channels facilitate an instant, accessible and central audit trail and case-management system. • Some digital tools may make it easier to track and report GBVH that crosses borders.	• Poor design may mean that follow-up or investigations are challenging (that insufficient information is gathered, for example). • Fears about data confidentiality may discourage people from using digital channels. • Companies may be concerned about high levels of demand and whether they have the resources to respond adequately. • Some digital tools are expensive and may require ongoing external IT and administrative support. • Digital tools may be less accessible if there are issues related to language, literacy and access to technology.

5.4 / Recruitment and performance assessments

Recruitment and performance assessment processes provide an important opportunity to prevent GBVH. Table 8 outlines practical considerations for integrating GBVH prevention into recruitment and performance assessments. It is important that these relate to all workers, irrespective of contractual status, (including volunteers, interns and apprentices). Where there are fluctuating or seasonal demands, companies sometimes engage casual labour on a daily wage without proper recruitment or vetting. At the very least, companies will need to ensure that all casual workers know how to raise grievances about GBVH at work.

Table 8 / Integrating GBVH prevention into recruitment and performance assessments

Risk factor	Things to consider
Application process	• **Include a clear statement in job adverts** that the company is committed to addressing GBVH in all of its operations. • **Mention whether the role requires a criminal record check**, so that candidates can report any past behaviour about which they may be concerned, or not apply. • **Provide a confidential self-disclosure form** to allow candidates offered a conditional role of employment to tell the company in confidence about any past investigations, disciplinary procedures or criminal convictions. • **Discuss with third-party recruitment agencies** whether they might be (unwittingly or wittingly) engaging in GBVH or enabling behaviour.
Interview	• **Establish written recruitment procedures** outlining the decision-making process based on clear criteria. • **Make candidates aware of the behaviour expected from interviewers** and how to report any behaviour they may find inappropriate or worrying. • **Ensure interview panels are staffed by at least two people** with a female interviewer present for a female interviewee. • **Ask value-based questions** to assess candidates' understanding of acceptable workplace behaviour.
Vetting checks	• **Request at least two references**, including one from a candidate's most recent employer. • **Check a candidate's identity**, such as their passport/ID papers, at interview. • **Where feasible, perform criminal record checks** to identify prior convictions (although these are limited in many countries). • **Follow up on any concerns**, seeking advice from HR or legal experts as necessary. • **Ensure vetting is proportionate**, with additional checks for high-risk roles.
Contracting	• **Provide written contracts for all workers**, including temporary workers, to ease concerns that they may lose their job if they report GBVH. • **For all workers, include contract language that clearly states GBVH disciplinary actions**, with links to company policies, procedures and codes of conduct.
Inductions	• **Provide all new recruits with training or induction sessions** on relevant GBVH policies, codes of conduct and grievance mechanisms. • **Require all new workers to read and sign relevant codes of conduct**. • **Consider a short probation or trial period** (of 3-6 months) to allow any concerns to be raised with the worker and appropriate action taken, if necessary. • **Ensure that casual workers know how to report a grievance**, for example, by displaying information posters in key places.
Performance assessments	• **Use praise and/or the company award/reward systems** to recognise positive behaviour with regard to addressing GBVH. Reduce opportunities for sexual exploitation in bonus or other employee reward schemes. For example, at least two people should make the bonus decisions, based on clear set of criteria, in transparent procedures. • **Use objective and transparent productivity metrics** help to ensure bonuses are not used as an opportunity for exploitation and abuse. • For staff tasked with addressing GBVH, refer specifically to this responsibility in their **scope of work, annual objectives and appraisals**. • **Hold exit interviews** to glean any information that workers are afraid to report during their employment, but may be more willing to share at the point of departure.

5.5 / Training and awareness raising

Training and awareness raising activities give company leadership an opportunity to send a clear message to workers and external stakeholders that the company is committed to preventing and responding to all forms of GBVH. Workers and stakeholders can learn more about what constitutes GBVH, how to report it, the process that follows, what support services are available and how to access them. Such sessions can facilitate discussions that lead to a better workplace culture. They can help those inside and outside the firm to understand the company's GBVH-related policies and procedures and codes of conduct, which can discourage perpetration and encourage reporting.

5.5.1 / Internal training sessions

There are many GBVH training options for managers, supervisors and workers, ranging from short, one-off online training courses focused on basic information to more intensive courses designed to transform attitudes and behaviour. Training can be standalone and/or incorporated into other training modules (such as wider occupational health and safety courses). Shorter courses in multiple doses can be useful and effective, but caution should be exercised when it comes to one-off compliance-focused courses, as such training may have little impact.[81]

Effective training tends to be tailored and proportionate to the GBVH risks associated with a particular investment, project or operation, as well as its sectoral and country context. Training should be offered during working hours on company time. Table 9 offers training suggestions.

Table 9 / Developing the content and format of GBVH training

Suggested elements for tailored training courses	
Format	• **Offer interactive, participatory training techniques** with opportunities for work in smaller groups, which can encourage self-reflection and create scope for discussion about gender and beliefs that support or tolerate GBVH. • **Train small groups of ideally no more than 10 people at a time**, breaking into even smaller groups where the training requires discussion. • **Ensure courses are delivered by a trainer with GBVH expertise.**
Suggested content	• **What is GBVH?** Include a clear explanation of its impact. • **What causes GBVH?** Include a discussion of gender inequality and stereotypes (allowing time for participants to discuss and reflect on these concepts). • **What are the company's policies and codes of conduct on GBVH?** Clearly outline behaviours that are not tolerated and the rights and responsibilities of workers, supervisors, managers and others. • **What are the company's grievance mechanisms and investigation procedures?** How can workers report concerns? What are workers' rights and responsibilities after reporting? What is the process and timeframe for investigations? What support services and safety measures are available for those who have experienced, witnessed and/or reported GBVH?
Practical tips	• **Track participation** to ensure the training reaches all workers, including contractors, truck drivers and security personnel. • **Use feedback forms** to determine participants' understanding of the training and to improve future sessions. • **Check workers have signed copies of the company's GBVH policies and codes of conduct** to show that they understand and will adhere to them. • **Check training materials are suitable for participants**, for example, in an accessible format for those who are semi-literate/non-literate, migrants, those with visual or hearing impairments.

Additional specialised training for GBVH response staff	
Additional content	Those responsible for handling reports of GBVH and commissioning investigations of GBVH reports should receive additional training on the following: • **detail on the roles and responsibilities** of those responsible for receiving reports and following up • **comprehensive training on company grievance mechanisms and investigation procedures**, including scenarios and group exercises (such as role playing) to ensure staff are prepared to respond effectively • **understanding how GBVH risks can be exacerbated by various factors** (such as seasonal deadlines or the presence of temporary workers) • **thorough understanding of a survivor-centred approach** and the importance of confidentiality • **comprehensive understanding of the local support services** available to survivors and witnesses • **knowledge of the GBVH, legal and child-protection expertise** available to the company and the qualified third party providers the company has identified to undertake investigations • **basic training on psychological first aid** to guide interactions with survivors.

Providing psychological first aid

Psychological first aid provides a framework for supporting people who have suffered trauma in ways that respect their dignity, culture and abilities. Despite its name, psychological first aid covers both social and psychological support. In 2011, the World Health Organisation (WHO) published Psychological First Aid: Guide for Field Workers.[82] The model, developed with low- and middle-income countries in mind, is a series of practical, humane, culturally adaptable actions that anyone can take to support people who are distressed or vulnerable after a crisis. This support does not depend on the arrival of mental health professionals or emergency services, who may be few in number or late on the scene.

Emphasise positive behaviour and the importance of 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.[88] Although GBVH training may 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, small group-based participatory training can encourage people to look out for others' wellbeing and to report GBVH when they witness it.

Further reading on training resources

Terms of Reference for Sexual Harassment Training, developed by IFC, see tool 4.5 for insights into recruiting an expert consultant to conduct training.[83]

The ILO and IFC's Better Work programme offers a series of tailored training courses ranging in duration from one hour to six days on preventing harassment, occupational safety and health, communication and supervisory skills.[84]

The HERrespect Curriculum 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-hour curriculum for managers and male and female workers, plus three joint activities for managers and workers (90 minutes each).[85]

5.5.2 / Awareness raising with communities and service users

Raising awareness among community members and service users on the behaviours they can expect from company workers, but also what is expected of them in terms of interaction with each other (as service users) and with workers, can help to reduce GBVH risks. It is also important to have clear messaging on what GBVH is, the ways to report it and how reports will be handled.

Awareness raising can form an important component of a broader strategy to reduce GBVH risks, but it is not always effective as a standalone strategy.[86] Activities need to be targeted and accessible to the audience, for example, through meetings with service-user groups, community leaders and local NGOs, posters in project host communities and spaces where services are provided, and events linked to international campaigns (such the 16 Days of Activism against Gender-Based Violence,[87] which runs annually from 25 November to 10 December).

👁 Examples of awareness raising among service users in the transport sector

Egypt – Egyptian National Railways (an EBRD client) is conducting a series of awareness-raising activities to improve passenger safety and prevent GBVH. Examples include a public awareness campaign for train travellers on acceptable and unacceptable behaviour and information boards showing the locations of complaints offices and reminding passengers of surveillance cameras on trains and platforms. Egyptian National Railways has also trained their master trainers and security personnel on preventing sexual harassment in trains and stations.[89]

Brazil – In Rio de Janeiro, several major transport stations have established centres offering legal, medical and counselling support to those affected by GBVH, as well as 107 electronic information terminals to raise awareness.[90]

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.[91]

See Sector Brief linked to this note on Addressing GBVH in the Transport Sector for further examples of emerging good practice.

👁 Examples of awareness raising in communities

Malawi – Traditional leaders are playing a key role in preventing GBVH as a result of the labour influx tied to rural road projects, according to a World Bank/International Bank for Reconstruction and Development study. Traditional leaders have raised awareness about incoming workers starting temporary sexual relationships with local women, including the risks of sexual violence, disease and pregnancy.[92]

Bangladesh – A project with garment workers in Dhaka has trained male and female workers as peer educators and advocates to challenge GBVH. The peer educators engage with the wider community through sessions organised in workers' cafes. The project has also engaged in community-based campaigns and factory-wide training.[93]

5.5.3 / Awareness raising with workers' partners and family members

Where company operations provide women with economic opportunities for the first time and where there are strong, negative views about women working outside the home, companies can consider awareness raising activities targeted at women's partners and family members, for example, inviting them to staff inductions. This can help to address concerns and emphasise the benefits of such work and help prevent potential increases in domestic violence in the early stages of women's paid employment.

👁 Example of awareness raising with male partners to prevent GBVH against employees

Sierra Leone – Sierra Leone Opportunities for Business Action is a UK government-funded agribusiness programme that has put in place a range of low-cost initiatives to mitigate the risk of its female employees experiencing violence from 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 facilitated a conversation on domestic violence during staff induction.[94]

5.6 / Working with contractors and suppliers

It is important that companies demonstrate and model the standards they expect their contractors and suppliers to meet. Companies generally have greater influence over preventing GBVH early on in a commercial relationship through procurement processes and contracts, but can also make informal efforts later on to raise awareness and share information with contractors and suppliers.

There are some key differences in company relationships with contractors and suppliers. Relationships with contractors, especially on large-scale projects, are often managed through contractor management plans, which cascade investor requirements, such as GBVH-related policies, codes of conduct and training, to contractors and third parties, making it easier to manage risks. Table 10 suggests some practical tips for working with contractors.

Example of how to address GBVH in contracts

Nepal – The Rural Access Programme 3 (RAP3) is a UK-funded programme implemented by IMC Worldwide. The programme worked 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 "non-discrimination and equal opportunities" sub-clause requiring contractors to implement GBVH prevention 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 preventative measures to be taken by all workers."[95]

Source: DFID

Table 10 / Practical entry points for working with contractors to address GBVH

Stage	Potential entry points
Procurement process	• **Bid documents** that include information about GBVH risks and expectations, including early tender notices, terms of reference, requests for proposals and bidding instructions • **Evaluation criteria** that reflect GBVH requirements, such as the proposed approach to GBVH prevention and response, a bidder's code of conduct and whether the contractor has had any contract terminated or suspended due to previous GBVH incidents • **Request for bidders to share GBVH policies and procedures** where present and a requirement to adhere to the company's GBVH policies and procedures where these are not in place • **Clearly established, realistic costs** associated with GBVH prevention measures[96] (for example, for training or engaging service providers)
Contract selection and negotiation	• **Clauses in contracts** committing contractors to adhere to company GBVH policies and procedures, which can include specific GBVH risks and agreed measures to address them • **Reporting requirements** in relation to GBVH, potentially including the use of KPIs (see Section 7 and Annex 8). • **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 that could potentially act as partners • **Including contractors in company training** on GBVH • **Integration of GBVH issues into contractor control management tools**, including a review of GBVH risks when monitoring contractor performance

5.6.1 / How to manage GBVH risks along the supply chain

A company can:

• **Map where GBVH risks are highest in its supply chains**. Companies may also want to consider GBVH risks in a supply-chain context, including

the risks that their own practices may create or exacerbate. For example, tight delivery times, seasonal buying pressures and last-minute changes to orders can put intense pressure on suppliers and their workers. This can increase the risk of supervisors and managers using verbal aggression and physical violence in a misguided

attempt to increase productivity. A company can discuss these issues with its suppliers to identify and agree ways to relieve production pressure. This can include longer lead-in times and focusing on non-violent ways to encourage productivity, such as clear communication of expectations, as well as financial and reputational rewards.

- **Map GBVH risks against its levels of influence.** A company may have greater influence over its first-tier and core suppliers than others. It can encourage and support these suppliers to align with expected GBVH risk management practices, for example, by agreeing acceptable codes of conduct, raising awareness about policies and procedures and including suppliers in relevant training sessions. A company may also wish to monitor how GBVH prevention and response efforts are implemented through spot checks and/or the third-party monitoring of first-tier suppliers. In the absence of leverage or supplier willingness to engage, a company may be able to reorient its supply chain over time to reduce risks and increase its level of influence.

- **Explore possibilities to form partnerships with others to increase influence and address risks in the supply chain.** A company may also have opportunities for wider influence and to share its learning on assessing, preventing, responding to and monitoring GBVH. Where a company's leverage is low (for example, where it accounts for a very small share of a suppliers' business), collaborating with others can help to step up pressure on suppliers to address GBVH. This can include other companies that want to address GBVH, trade unions, NGOs, local organisations (such as service-user groups or community groups), or sector or industry bodies.

📕 *Further reading on working with contractors and suppliers*

IFC Good Practice Note on Managing Contractors' Environmental and Social Performance[99] for guidance on all PS aspects including preventing GBVH in the process of prequalification, solicitation, evaluation, contracting and procurement

👁 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 certain standards on GBVH and other labour issues. The agreements often include an independent office with the power to investigate workers' complaints and impose punishments on abusive managers and supervisors, including dismissal. Examples include:

- United States of America – 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 farm workers, fruit/vegetable growers and retail buyers. The programme is widely recognised for its worker-driven, market-enforced approach.[97]

- 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 agreement, which became enforceable in 2019, follows years of advocacy by a coalition of labour unions and women's rights advocates.[98]

5.7 / Physical design

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

Safety audits are a useful tool for identifying and assessing physical safety issues from the perspective of workers, service users and community members. Audits need to consider perceptions of safety for different groups, particularly women. Safety audits can help identify hotspots for violence and harassment, such as toilets, corridors, workers' dormitories, access routes to and from worksites and during commutes, and public spaces in the community.

For some sectors or communities, these hotspots may be quite specific, such as truck drivers' rest stops. Hotspots such as these may require targeted measures for GBVH prevention and response, including awareness raising.

👁 Example of safety audits

Vietnam – The SafetiPin app is a gender-sensitive safety audit that collects information about how safe people feel in different locations. The Asian Development Bank used the app in the design of the Hanoi Metro system[100] to reduce GBVH on Vietnam's first metro line. Companies can also use SafetiPin to improve safety for employees workers, community members and service users.[101]

Papua New Guinea – the Gender Smart Safety Programme helps companies identify risks and improve safety for women workers. The programme was developed by the Business Coalition for Women, with the support of IFC. Three companies with operations in Papua New Guinea – Oil Search, St Barbara and New Britain Palm Oil – provided financial support and participated in the pilot. The three companies adopted targeted strategies to mitigate and monitor risks women face in the workplace. One company's response to its gender-smart safety audit meant that the percentage of women who felt happy about their safety at work rose by 18 per cent.

📖 *Further reading on physical design*

The EBRD's Performance Requirements, including on Labour and Working Conditions (PR2) and Health and Safety (PR4)[102]

IFC's Performance Standards, including on Labor and Working Conditions (PS2) and Community Health, Safety and Security (PS4)[103]

Infrastructure and Cities for Economic Development's (ICED) Violence against Women and Girls, Infrastructure and Cities briefing paper for a framework for integrating GBVH into urban and infrastructure programming[104]

UN Habitat's Women's Safety Audits: What Works and Where? on the tools and practices that work for the safety audit process[105]

UN Women and Unilever's Global Women's Safety Framework in Rural Spaces for insights from the tea sector that can be applied to other commodity sectors in agricultural value chains[106]

The Sexual Exploitation, Abuse and Harassment in Infrastructure tool[107]

ICED note on integrating GBVH policy into transport, Transport: A Game Changer for Women's Economic Empowerment[108]

Table 11 / **Assessing GBVH risks – an illustrative checklist for workplaces**

Location, grounds and access routes	• Buildings and grounds in locations perceived to be safe by the local community • Well-maintained lighting in and around grounds and access routes • Security equipment (such as CCTV cameras) • Personal alarms for workers in isolated locations or situations
Water, sanitation and hygiene (WASH) facilities	• Separate, lockable latrines • WASH facilities conveniently located and easily accessible • Well-lit WASH facilities • Provision of hygienic and safe sanitation disposal facilities
Transportation	• Safe transport provided to and from worksites • Safe walking routes to and from safe waiting areas at transport facilities (including public transport stops)
Worker accommodation	• Living facilities located within reasonable distance from worksites • 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 • Adequate and well maintained lighting around worker accommodation • Measures in place to avoid overcrowding and lack of privacy
Social aspects	• Social spaces that are safe and welcoming places for all workers to use • Leisure areas designed to be attractive to all workers, instead of reinforcing gender stereotypes, such as only men should work out and show physical strength

6 /
Responding to reports of GBVH

Key objective: *Understanding the issues that companies and investors need to consider when handling GBVH reports, including supporting survivors, witnesses and whistleblowers*

As well as taking action to assess GBVH risks and prevent GBVH from happening in the first place, companies and investors will need to be prepared to respond to reports of GBVH. As outlined in Section 5, companies and investors need to proactively enable and encourage reporting. They should ideally put procedures and systems in place before reports come in.

6.1 / Company responses to reports of GBVH

Companies will need to be prepared to respond to reports of GBVH when rolling out grievance mechanisms and investigation procedures (see Section 5.3.2). Company responses should be led by trained individuals who prioritise the safety and support needs of survivors, witnesses and whistleblowers.

It is important that when a report is made, companies avoid rushing to act in an impulsive or ill-conceived way and, instead, take time to respond thoughtfully and effectively, drawing on additional GBVH, child-protection and legal expertise as needed. Responding poorly or inappropriately to reports of GBVH can undermine the credibility of a company's efforts to address the issue and may cause further harm to those involved. In contrast, effective handling of reports can reinforce the message that the company is committed to addressing GBVH, playing an important role in future prevention. Well-handled reports of GBVH directly benefit the individuals involved and are less likely to go to court and result in compensation claims.

In responding to reports of GBVH, the aim is to prevent the violence or harassment from reoccurring and to mitigate the harm caused to those who have experienced and witnessed it. The extent to which a company can take action on a report will vary according to the level of control and duty of care it has over those involved, as well as the availability of services.

Reports of GBVH may come through formal grievance mechanisms, but companies and investors can also expect them to come to them through informal channels as well, for example, through direct approaches by survivors on site visits, through media reports or through third parties.

Sometimes, a report 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. Such concerns still need to be treated as potential reports that may require investigation.

⚠ Implementing a survivor-centred approach

A survivor-centred approach 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 be safe, including keeping their information confidential

- treat all survivors equally and non-judgementally, making sure their experience is not unfairly dismissed, for example, because they are young, old, disabled, a sexual or gender minority, or work in prostitution.

A survivor-centred approach is the preferred way of addressing GBVH. It helps to reduce the potential for further harm to survivors and, the likelihood of further financial and reputational risk to companies. Anchoring decision-making in a survivor-centred approach is, therefore, in the interests of companies and investors.

⚠ Violence against children

Responding to reports involving children requires a different approach and specific child-protection expertise. Children and minors under the age of 18 are unable to give consent for any sexual activity, regardless of national law. Many organisations, therefore, consider sexual activity with individuals under the age of 18 to be child sexual abuse.[109] Responding to reports of violence, including GBVH which involves children requires specialist advice that is beyond the scope of this note, so not covered in the following section. For specific guidance, please see International Child Safeguarding Standards.

6.1.1 / Providing immediate support options and monitoring needs

When a report of GBVH comes to light, the immediate priority is to enable survivors to access the professional support they want and to work with survivors, witnesses and whistleblowers to identify safety measures to protect them from further harm. In some cases, witnesses and whistleblowers may also want to access support services (psychological support, for example, if they are traumatised by something they have seen or heard).

Companies will need to provide private spaces where support options and potential safety measures can be discussed with survivors (or witnesses and whistleblowers). This is an important aspect of maintaining confidentiality and enabling any concerns to be discussed. The support services a company identifies might be different to those a survivor would like to access. In some cases, a survivor may not want to access any support services at all and it is important that companies listen to and respect their choices.

Support options and safety measures offered to survivors, witnesses or whistleblowers ought to be:

- independent of any other action taken in response to the report of GBVH
- proactively offered, rather than only made available on request
- presented in a way that gives survivors (and witnesses and whistleblowers) choice and control, so they can make informed decisions
- provided by trained staff, so as not to cause further harm.

It is important that survivors, witnesses and whistleblowers are able to access support services during working hours so there is no additional cost to them. Extra support may increase the uptake of services. For example, companies could offer to provide chaperones to accompany them when they use services.

Identifying support and safety needs is not a one-off act but rather something which needs to be continuously monitored. This is likely to require multiple conversations with survivors, witnesses and/or whistleblowers over time.

✅ Potential support options

- **Medical support** for incidents involving sexual violence,[110] which may include treatments that need to be administered within 72 hours of the incident to be effective,[111] such as:
  - **emergency contraception** to prevent unwanted pregnancy
  - **post-exposure prophylaxis treatment** to reduce the chances of HIV infection.
- **Psychological support** for survivors and witnesses, which may need to include trauma counselling for victims of sexual violence or harassment
- **Legal advice** for survivors, whistleblowers, witnesses and alleged perpetrators
- **Financial support**, including paid leave for survivors and witnesses
- **Measures that support reintegration into the workforce**, for example, career or guidance counselling or professional mentorship
- **Child-protection support services** and/or expertise for reports involving children.

👁 Example of giving access to independent counselling and legal services

Jordan – It is estimated that around 80 per cent of the 28,000+ workers employed in Jordan's Al-Hassan Industrial Zone are migrants from India, Sri Lanka and Bangladesh. In 2014, a multi-purpose centre for workers was established to provide training, healthcare, and a safe space for workers to seek legal advice and counselling should incidents of sexual harassment occur. IFC and Better Work Jordan are helping to set up an external independent grievance mechanism and a referral pathway. There will be dedicated training for personnel responsible for managing possible incidents, and the factories will be encouraged to provide workers with access to the grievance mechanism.[112]

Source: BetterWork Jordan/IFC

💡 Dealing with a lack of local services

Companies may operate in environments where there is a lack of support services. A company may have identified the type of support a survivor needs, but struggle to find an appropriate service provider locally. In such situations, companies could try to identify international organisations with local operations that may be able to provide or facilitate access to support. Companies can also seek to secure expertise from outside the local area.

6.1.2 / Assigning someone to lead the company's response

When a report of GBVH is received, a company will need to assign someone to lead its response. It is important this lead person has been trained in how to respond to reports of GBVH and has the skills and confidence to take a survivor-centred approach. Ideally, they should be chosen from a pool of trained individuals and have no actual or potential conflicts of interest or bias. Companies with a large workforce and which operate across multiple locations will want to have a number of trained individuals at each site/workplace. The lead person's responsibilities are likely to include:

- ensuring the GBVH report is appropriately and securely logged in the company's internal system and that confidential records are kept

- ongoing monitoring of the support and safety needs of survivors and any witnesses and/or whistleblowers

- ongoing communication with survivors to ensure their wishes inform all decisions about the company's response to the report, including initial decisions on how to proceed

- ensuring confidentiality is maintained throughout the process of responding to the report and any follow-up actions

- hiring any expertise needed to help respond to the report, for example, a trained investigator with specialist skills.

It is important for companies to bear in mind that those leading the company's response may themselves need to access some support, for example, if they are struggling to deal with what they are hearing.

The first person a survivor speaks to after reporting GBVH may significantly affect the course of their recovery. If it becomes clear that the person leading the company's response does not recognise the sensitivity of GBVH cases, companies may need to consider appointing another employee or third party to lead their response instead.[113]

6.1.3 / Deciding whether to investigate

Although all reports of GBVH require follow-up, not all reports of GBVH will require an investigation. The decision on whether to investigate will be determined by various factors, including the severity of the reported behaviour, its impact and the wishes of the survivor.

⚠ Maintaining confidentiality

It is crucial that confidentiality is maintained in relation to reports of GBVH in order to protect survivors, witnesses, whistleblowers and alleged perpetrators. However, as with all confidential matters, this does not mean that information on the report should not be shared with anyone: to effectively respond to the report, it may need to be shared with others.

It is critical that all details of the report – and any subsequent investigation and associated interviews – be kept confidential. The identities of everyone involved, including any investigators, will need to be protected. To do this, companies can:

- limit the number of people with whom information is shared

- give thought to the timing and location of any investigation activities, including interviews, so that they are away from worksites and not observed by others

- file all paper and electronic information in secure locations

- link failure to maintain confidentiality to disciplinary procedures and make this clear to all.

It is also important to control rumours by ensuring that managers who are informed about the report are aware of what they are/are not allowed to communicate to others.

✓ Considering severity of impact

As noted in Section 2, it is important to focus on the impact of GBVH, rather than just the severity of the behaviour itself. For example, stalking is a form of GBVH which may involve staring, following and leaving messages. In themselves, these behaviours may not immediately be considered "severe". However, the psychological impact of stalking can be devastating. Stalking can also have severe financial impacts, for example, if someone leaves their job to avoid a perpetrator. People may also suffer physical symptoms as a result of the stress and anxiety of being stalked.

An investigation may be unnecessary for reports of GBVH with a less severe impact. In these cases, actions can still be identified to help remedy the situation, for example, through:

- if they are contracted by the company, designing and implementing a personal improvement plan for the perpetrator (which can be used to remove people who do not show adequate and appropriate changes in behaviour)

- apologies and commitments by perpetrators to change their behaviour

- additional communication to reinforce messaging on the company's codes of conduct

- further training and awareness raising activities which focus on the impact of GBVH and positive behaviours.

If there is no investigation, the company will still need to help the survivor with security and other welfare measures, including access to support services in line with their wishes.

> ⚠️ **Survivors' views on reporting to the authorities may differ**
>
> If a report of GBVH includes an illegal act, the survivor may want to report the case to the police. It is, therefore, important that the person leading the company's response understands national law related to GBVH and what constitutes criminal behaviour.
>
> In some contexts, survivors may be concerned that reporting an incident to the local authorities could put them or the alleged perpetrator at risk of harm. For example, in a case of sexual harassment, if the survivor is a married woman in a country where extramarital relations are illegal, there is a risk of an honour killing. With a report of sexual exploitation, if the survivor and perpetrator are the same sex and homosexuality is illegal, they could face corporal or even capital punishment.
>
> When the reported behaviour potentially involves a criminal act, companies are advised to take legal advice.

> ⚠️ **Respect survivors' wishes: a safer approach for survivors and for companies**
>
> A survivor may not want an investigation, even after making an initial report of GBVH. This could be for a number of reasons (see Section 5.3.2).
>
> Taking action against a survivor's wishes could cause them significant harm, they could be subject to backlash in the form of further GBVH. This may also result in additional risks to the company.
>
> A desire to respect the wishes of survivors can pose a dilemma for companies and investors if 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 the survivor at risk, but not investigating could put others at risk. It is important that companies faced with such a complex situation quickly identify a GBVH expert and legal expert who can provide tailored advice. If a report involves a child, a child-protection expert will be needed.

> ✅ **Take a non-judgemental approach**
>
> The following factors do not diminish the severity of an incident or the credibility of a report.[115]
>
> - **A delay in reporting:** Individuals may delay reporting because of fear of backlash, not knowing or trusting company policy, fear of being blamed for causing the GBVH, not understanding it was GBVH, or needing to overcome the initial trauma or upset.
> - **A sexual relationship was at one time consensual:** This is not a defence against a subsequent charge of sexual harassment, exploitation or abuse.
> - **Clothing, appearance or flirtatious behaviour:** These do not provoke GBVH and do not give anyone permission to touch or make sexual remarks.
> - **The sexual orientation or gender identity of the survivor:** This does not mean they have provoked GBVH or that the impact of GBVH is any less severe.
> - **The survivor has worked or is working in prostitution or engaging in transactional sex:** This does not mean they have provoked GBVH or that the impact on them is any less severe.

The company and the person leading its response will need to determine the following:[114]

- Is there sufficient information to constitute a grievance?
- Does the 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 grievance can be upheld?

Where a case has been reported to the police, companies will need to decide whether it is appropriate to proceed with their own separate investigation. If undertaking a separate investigation, the company should ensure that it does not compromise the criminal investigation or cause further harm to the survivor (for example, by requiring them to be interviewed twice). Regardless, the company should provide support and safety measures for the survivor. In such circumstances, it is likely that companies will need to take legal advice.

6.1.4 / Commissioning an investigation and taking follow up action

Companies should ideally already have clear investigation procedures in place before they receive a report of GBVH, including an appeal mechanism.

When an investigation goes ahead, the alleged perpetrator will need to be informed that there is an accusation against them and be given an opportunity to respond. If the alleged perpetrator is a company worker, they may need to be suspended while an investigation takes place. Investigation procedures should clearly set out the protocol for such suspensions and should also contain additional potential protection measures, such as the ability to reassign workers (to assign the alleged perpetrator to a role with limited and/or supervised interface with workers, community members or service users) or restrict the movements of the alleged perpetrator (for example, by limiting work-related travel) while the investigation is being conducted.

When making a decision on whether or not to suspend an alleged perpetrator during an investigation, or to impose other protective measures, the following will need to be considered:

• the severity of the impact of the alleged incident

• whether not suspending the alleged perpetrator could put others, or the accused themselves, at risk

• the need to protect the identity of the survivor and/or to minimise the risk of retaliation.

The person leading the company's response may need to:

• Develop the terms of reference for the investigation.

• Oversee the selection and commissioning of a qualified investigator with GBVH expertise. If this expertise is not available locally, then a national, regional or international expert may be needed.

• Ensure measures are in place to protect everyone involved in the investigation. This not only includes the survivor and witnesses, but also the investigator and the alleged perpetrator.

• Continue to facilitate support for survivors and witnesses and whistleblowers.

Once, commissioned, the investigator is usually responsible for:

• undertaking a risk assessment for the investigation and for taking necessary measures to protect safety and confidentiality

• planning the investigation and establishing the substantive questions the investigation will seek to answer

• allowing participation of representatives in the investigation process (for example, those participating in the investigation may want their own lawyers or representatives of trade unions, community or service user groups or other external parties to represent or accompany them in investigation activities)

• making recommendations on the work status of the alleged perpetrator during the investigation, if they are a company worker

• gathering and securing evidence, including conducting interviews

• concluding an investigation finding based on the evidence gathered

• preparing and submitting an investigation report including a record of all steps.

✅ Encourage survivors and witnesses to feel safe and comfortable

The investigator will need to ensure the survivor and any witnesses (or person they wish to accompany them) feel comfortable in interviews. Survivors and witnesses should be able to express a preference to be interviewed by an investigator with certain characteristics, for example, a woman.[116]

During and immediately after the investigation, the person leading the company's response, (or the investigator) will also have to:

• regularly update the survivor and other parties involved[117] on the progress of the investigation, without compromising confidentiality or the investigatory process

• communicate the outcome of the investigation to all relevant parties while still maintaining confidentiality

• file any records of the investigation so they remain confidential; grievances that were not upheld will need to be stored separately from an individual's personnel files.

It is important for companies to bear in mind that if an investigation finds that GBVH has taken place, this does not mean contracts with perpetrators must automatically be terminated. In some cases, dismissal of a perpetrator may be necessary; in others, less severe action may be warranted. Depending on the findings of the investigation, the company will need to identify remedial action that is appropriate and proportionate to the GBVH that has been perpetrated. Remedial action will have to take into account survivors' wishes, national employment law and company disciplinary procedures. In line with company policy, any disciplinary action will need to afford workers due process, representation and rights of appeal.

Following the conclusion of an investigation and disciplinary proceedings, if relevant, companies can draw lessons from the case, considering whether:

- changes are needed to company policies and procedures to help prevent further GBVH

- adjustments are required to grievance mechanisms and investigation procedures to strengthen the likelihood of future reports and the effectiveness of responses

- additional support services should be identified to help the company respond to future reports

- additional external expertise needs to be identified in case of future reports, for example, legal expertise or child-protection expertise

- further prevention efforts are required, such as additional training sessions, communications or awareness-raising activities for workers, community members and/or service users.

6.2 / Investor responses to reports of GBVH

Investors have an interest in knowing whether and what GBVH is taking place in their investments and whether grievances are managed and investigated in an appropriate manner, as this poses both a reputational and financial risk to them. However, it is important that investors recognise that companies need time to respond to reports of GBVH in a safe and appropriate way and do not pressure companies into rushing their response.

6.2.1 / Agreeing what needs to be escalated

Investors will need to decide what information on GBVH-related grievances they expect companies to report to them, how they want this information to be reported and within what timeframe. It can be helpful if investors agree early on with an investee what types of GBVH:

- need to be reported through routine monitoring (where there is no urgency)

- need to be reported as a matter of urgency

- need to be reported only once any investigation or other follow up has been concluded.

Similarly, investors may also need to decide when and how to escalate reports of GBVH in their investments internally within their own organisations and, potentially, to partners.

Investors could consider the following factors when deciding what needs to be reported:

- severity – whether the report relates to an incident of GBVH that has life-threatening or life-changing impact

- level of control – whether the report relates to an incident of GBVH that is within the direct control of the company or its suppliers/contractors

- reputational damage – whether the report relates to an incident of GBVH that presents a high level of reputational risk for the investor

- direct involvement – whether a report of GBVH directly involves an investor's own workers.

6.2.2 / Receiving reports of GBVH

GBVH reports can come to the attention of investors through formal or informal channels, not just the official grievance mechanisms of investee companies. For example, GBVH may be reported to investors through:

- direct whistleblowing 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 (for example, during a site visit)

- research or assessment reports related to investments, through which GBVH is reported or witnessed directly

- media reports, for example, where a survivor or witness reports GBVH via social media or speaks to a journalist about it.

The following questions are examples of those an investor might ask an investee company when they have escalated a report of GBVH to them. Investors will not need to be given any details or names of individuals in responses to these questions.

- Have measures been put in place to protect the health and safety of those involved? Does it require sending the survivor to a health clinic?

- Have appropriate support options and safety measures been identified and offered to survivors, witnesses and whistleblowers? Have these been taken up? Is there a risk of retaliation?

- Has someone been assigned to lead the company's response? Has this person been trained to deal with such reports?

- Are plans in place to maintain confidentiality and to protect the identities of those involved?

- Has 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 that they want it to take place?

- Is the reported behaviour illegal? If so, does the survivor want the allegation to be reported to the police? Has the company sought legal advice?

- If an investigation is going ahead, is it being conducted by a fully trained investigator who has experience in investigating reports of GBVH?

- If an investigation is not going ahead, have other follow-up actions been identified, including remedial measures and efforts to prevent future perpetration?

- If the parties are continuing to work during the investigation, has the alleged perpetrator been separated from the survivor?

- If there was an investigation, has it been concluded? If so, what was the outcome and have proportionate follow-up actions been identified, taking into account the survivors' wishes, national employment law and company disciplinary procedures?

- Has the investigation outcome been reported to those involved? Has information related to the investigation been securely and confidentially filed?

- Have lessons been drawn from the process to improve future GBVH prevention and response efforts? How have these lessons been reflected in company policies and procedures?

- Has the company reviewed/enhanced GBVH governance and oversight at board level?

⚠ Maintaining confidentiality when reporting to investors

Companies may find themselves in a situation where a survivor does not want action to be taken on a report of GBVH or any details to be shared with others, but the company has a policy or contractual requirement to escalate the report to its investors.

A survivor-centred approach means a survivors' wishes should be respected. However, in this situation, a company can still inform investors of an anonymous GBVH report without sharing any details that could reveal the identity of those involved or the actual accusation.

⚠ Appropriate investor responses

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 that could cause greater harm. As organisations, investors may decide that reports of GBVH need to be investigated. However, as individuals, investor staff and consultants need to refrain from personally:

- making any attempt to investigate the credibility of a report of GBVH
- contacting the individuals involved
- conducting any form of investigation themselves
- asking for details that 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-conceived way.

✔ Investor capacity to receive reports

Investors will need to develop a process for recording and tracking the reports of GBVH escalated to them by investees and ensure they have necessary organisational capacity to do so. If this capacity is not in place, investors will not be able to handle the reports they receive in a responsible way, including following up with investee companies to ascertain whether if they are responding to reports in a satisfactory way.

7 /
Monitoring GBVH

Key objective: *Understanding the value of continued monitoring of GBVH risks, prevention and response efforts, and methods that can be used to collect and analyse monitoring data*

7.1 / The benefits of monitoring

Effective monitoring provides assurance that GBVH risks and company capacity and resources to address GBVH are being assessed and managed. For investments, projects or operations that are already underway, assessments of GBVH risks and company capacity and resources may not have been undertaken in the earlier stages. The monitoring and reporting cycle provides another opportunity to raise questions about GBVH and to identify risks and prevention and response measures. 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 at the delivery stage of an investment, project or operation. Ongoing risk assessment enables any changes in risks to be identified and acted upon.

- Assess company capacity and effectiveness in preventing GBVH. Monitoring helps to determine whether adequate capacity and resources are in place and whether they are having the intended effect. Where new or increased GBVH risks have been identified, companies and investors can make informed decisions on any new or revised actions needed.

- Review effectiveness of company efforts to respond to GBVH-related grievances. Monitoring makes it possible to assess whether appropriate response mechanisms are in place and are being used effectively, so that any necessary improvements can be identified.

Companies and investors can integrate GBVH into existing monitoring and reporting processes. In this way, GBVH-related monitoring activities can be absorbed into the everyday business of companies and investors, rather than being viewed as an additional and separate task. However, information on GBVH will not usually be provided in regular monitoring reports unless it is explicitly requested. Investors can ask that companies record, collate and analyse GBVH-related monitoring data as part of regular contractual reporting. This reporting can facilitate a tangible ongoing discussion between investors and companies about GBVH risks and prevention and response efforts.

Monitoring data can also be reported internally to strengthen accountability for commitments on GBVH prevention and response. The use of monitoring data to support internal accountability within firms can include the submission of progress reports to company boards and to staff and their representative organisations. Companies can also demonstrate their commitment to addressing GBVH by making their findings publicly available, for example, by including explicit sections on GBVH in their annual reports.

7.2 / Collecting and analysing data

An important way for companies and investors to track the effectiveness of actions to prevent and respond to GBVH is through the use of KPIs. These need to be context-specific and disaggregated where appropriate. Annex 8 lists examples of KPIs that could be adapted and used by companies and investors.

⚠ Monitoring in a safe and inclusive way

To monitor safely and effectively, it is important that companies and investors:

- **Prioritise people's safety.** Throughout the monitoring process, the safety of workers, community members and service users is paramount. All data used for monitoring needs to be securely recorded and stored so confidentiality is maintained.

- **Recognise that experiences vary.** Monitoring needs to take into account the fact that the effectiveness of prevention and response measures may vary for different groups of workers, community members or service users.

💡 Time-bound indicators

The timeframes used for KPIs will determine how frequently data need to be collected and analysed based on risk and practicality. For example, if GBVH risks are high, then a KPI could be, for example, the number of reports of GBVH received through company grievance mechanisms in the past month. If GBVH risks are deemed low, the KPI could be the number of reports received through company grievance mechanisms over the past 12 months. Monitoring should also be more frequent when conditions are expected to undergo rapid change.

Quantitative KPIs can be helpful for tracking progress in areas that are readily and easily measurable and which are known to be a concern. For example, if a company sets out to train its entire workforce on GBVH, it is valuable to know what percentage of the workforce has been trained. However, it is also important to gather feedback on unanticipated issues. Collecting wider feedback helps to identify unintended effects of prevention measures and GBVH risks that have remained hidden. The use of qualitative methods and open-ended questions can give workers, community members and service users the opportunity to raise these broader issues. It can, therefore, be beneficial to select a mix of qualitative and quantitative KPIs.

The following are some of the methods that can be used to track progress against KPIs.

7.2.1 / Basic data from company records

Initial assessments of company capacity and resources to prevent and respond to GBVH can provide a baseline against which change can be monitored. The same questions used in the original basic assessments of company capacity and resources (as described in Section 4.2 and listed in Annex 3) can be repeated at set intervals to track progress.

Companies can also record basic data as part of their monitoring approach, including:

- 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 and/or service users reached through GBVH-related awareness raising

- the percentage of workers who have signed company codes of conduct.

Caution should be exercised when interpreting data on the number of reports of GBVH. An increase in reports does not necessarily mean there has been an increase in GBVH. Rather, a rise in the number of reports can be a sign that grievance mechanisms are being used, perhaps because they are more effective, better known and more trusted.

In contrast, the absence of GBVH reports is potentially a cause for concern, not reassurance. No occurrences of GBVH are unlikely, especially in companies with a large workforce and which interact with local communities and/or provide services. A lack of GBVH reports can be down to fear, shame or stigma deterring survivors and witnesses from coming forward. It can also be a sign of problems with grievance mechanisms, a company culture that discourages reporting and/or a lack of trust among workers, community members 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 someone with expertise in GBVH research and evaluation. Drawing on such expertise can help to avoid misinterpretation and wasting resources on unnecessary actions.

7.2.2 / Surveys

Anonymous surveys can be used to gather information from workers, community members and service users on the effectiveness of GBVH prevention and response measures. Such surveys can send an important message to survey recipients that the company is committed to preventing GBVH and ensuring it responds effectively to reports.

⚠ Prioritise 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 it is safer not to collect them under certain circumstances. Particularly in smaller companies, even anonymised monitoring information disaggregated by sex, age, disability status, grade or job-type could reveal who the complainants are and put them at risk.

Companies can work with an expert in GBVH-related research and evaluation to design targeted GBVH surveys or to integrate GBVH-related questions into existing worker, community or service-user surveys. Integrating questions into existing surveys can help to frame GBVH as a core company priority, rather than an additional consideration, and can help to improve response rates, allowing more information to be collected. Surveys can be used to monitor various aspects of GBVH, as outlined in Table 12.

For people who already use computers and mobile phones, electronic surveys may help to reassure them of anonymity and encourage more honest responses. It can also make it easier to ensure survey questions are provided in accessible formats and appropriate languages. However, the design of electronic surveys needs to consider the literacy levels of the intended respondents. Inadvertently excluding certain groups can lead to inaccurate and misleading findings.

⚠ Make sure survey questions do not cause further harm

It is important that company surveys do not directly ask workers, community members or service users whether they have experienced GBVH. Doing this could risk re-traumatising people and put them at risk if responses become known to others.

✓ Remind people of the definition of GBVH

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

Table 12 / **Examples of survey questions on GBVH**

Topic	Example questions for surveys of workers	Example questions for surveys with community members/service users
Knowledge and awareness	• Do you know where to find the company's policies and codes of conduct related to GBVH? • To what extent do you understand the company's policies on GBVH? • Do you understand what is expected of company workers when they interact with each other/community members/service users? • Do you think workers at the company would know how to report any concerns they had in relation to GBVH?	• Do you know if workers at company X are meant to follow a code of conduct? • Have you ever seen any information on how company X workers are expected to behave? • Have you ever seen any information on how community members/ service users are expected to behave when interacting with each other or with company X workers? • Do you think community members/service users know how to report any concerns they have about GBVH related to company X?
Safety and security	• How safe do you feel at work? • How safe do you feel travelling to and from work? • Do you think GBVH risks in the workplace have increased, decreased or stayed the same over the past year?	• How safe do you feel when accessing X service/when engaging with company X? • Do you think GBVH risks in the community have increased, decreased or stayed the same over the past year? Do you think that is related to company X?
Company culture and leadership	• How committed do you think the company is to preventing and responding to GBVH? • Do senior members of staff demonstrate commitment to addressing GBVH?	• How committed do you think company X is to addressing GBVH?

👁 Example of how workplace surveys can help monitor risks and test effectiveness of company systems

Bangladesh – CDC was aware of endemic GBVH in the garment industry in Bangladesh. This was perceived as both a human rights issue and a potential reputational risk. It was further linked to the high turnover and productivity challenges inherent in the sector. CDC conducted an initial assessment at a garment company, which suggested some obvious GBVH risk factors and found that the company had implemented a range of measures to reduce these risks.

In discussion with the company, CDC decided to test the effectiveness of the existing systems, including HR, grievance recourse and line-performance assessments. This was done by way of a welfare survey of 500 workers, conducted by an independent specialist survey organisation, using a combination of group interviews in the workplace and telephone interviews with employees outside working hours. The survey focused on management behaviour, grievances, time off, hours and turnover, as well as identifying which company benefits employees appreciated most.

The results were discussed with senior management and the company committed to using the results to shape a revised approach to HR processes, including actions to improve grievance mechanisms, as well as online training to hone supervisor management styles.

Potential follow-up actions include the roll-out of training on acceptable behaviours and greater specificity on how grievance recourses can be pursued for challenging behaviours experienced in the workplace.

Source: CDC

7.2.3 / Feedback forms

In addition to tracking the number of participants attending company GBVH training or community/service-user awareness-raising events, it is also important to understand whether these efforts have been effective. One of the easiest ways to do this is to distribute feedback forms immediately after training sessions and awareness-raising activities. Questions can be used to:

- ask whether participants have understood the information provided
- find out how helpful people have found the training sessions, events or materials
- understand whether there are any remaining gaps in participants' knowledge.

Finding common gaps in participants' understanding can help to identify whether more targeted follow-up information is needed. This can shape changes to future sessions and materials to make them more effective. Feedback forms can also request basic data on characteristics relevant to the company's workforce, local communities and service users to enable disaggregated analysis, which can help to identify the need for more targeted sessions with certain groups.

7.2.4 / Observations during monitoring visits

It is important that company and investor staff do not ask workers, community members or service users questions about their experience of GBVH. Doing so could cause further harm and distress to survivors and witnesses. However, staff and consultants working for companies and investors could make some basic observations during monitoring visits based on the following:[118]

- How are you treated as a visitor? Are you briefed on company codes of conduct and what is expected of you?
- Is sensitive information about GBVH kept confidential or shared openly with you?
- When visiting worksites, community spaces and places where services are provided, can you see information on company GBVH policies and grievance procedures?
- Does relevant project material include information about how to report incidents of GBVH through grievance mechanisms?

⚠ Call on GBVH expertise when needed

If monitoring reports or observations during site visits suggest that GBVH risks may have increased or raise concerns about the effectiveness of a company's prevention and response measures, a GBVH expert can be commissioned to assess these concerns in greater depth. This would be equivalent to the in-depth assessment of GBVH risks described in Section 4.3.

ANNEXES

Annex 1: Indicators of GBVH risk

Table A1 lists each of the factors outlined in Section 4.1 and explains how these can increase GBVH risks. A potential source of data is provided for each risk factor. These sources of data have been selected based on the information that tends to be available in emerging economies. GBVH expertise is not required to assess the risk factors using these sources of data, but users will need a basic knowledge and understanding of GBVH, as well as wider social and gender-related issues.

Table A1 / **GBVH risk factors**

Risk factors related to country context		
Risk factor	**Why this increases GBVH risks**	**Potential sources of data**
Gender inequality Gender inequality creates a divide between men and women in terms of access to rights, resources and opportunities. This results in unequal outcomes. For example, women: • Are more likely to live in poverty. • Have reduced access to justice. • Suffer poorer health outcomes. Gender inequality is maintained through a combination of social beliefs and national laws.	GBVH is rooted in gender inequality and discrimination against women. • Women who are poorer and struggling to meet basic needs are vulnerable to sexual exploitation. • When women lack access to information about their rights and access to resources to seek help, they are less likely to report GBVH, leading to increased risk through impunity for perpetrators.	• World Economic Forum global gender-gap data
Gender stereotypes Gender stereotypes set expectations about how men and women should behave. Gender stereotypes can impact on every aspect of people's lives, including: • The type of work women and men are expected to do – and whether women are expected to do paid work at all. • The types of relationships men and women are expected to have. • The clothes men and women are expected to wear. • What is considered acceptable in terms of how men and women behave.	• Gender stereotypes that prescribe that men should be dominant, physically aggressive and are entitled to sex and control over women's bodies can lead to an increased risk of GBVH. • Gender stereotypes can mean that GBVH is viewed as normal and inevitable. This can reduce the deterrent for potential perpetrators and lead to increased risks. • GBVH can be used to punish people who do not conform to gender stereotypes. Where gender stereotypes are expected to be rigidly adhered to, this can lead to increased GBVH risk.	• Views on whether domestic violence is ever justified (as a proxy indicator for wider views on GBVH). Can be derived from DHS, based on the percentage of women who agree that a husband is justified in hitting or beating his wife for at least one specific reason[119]
Prevalence of intimate partner violence The most commonly available data on GBVH in emerging economies are on the prevalence of intimate partner violence: • Although underreporting of intimate partner violence is a challenge in all countries, it is very high in some contexts. This means that national data will often be an underestimate. • In some emerging economies, data on intimate partner violence are regionally disaggregated. In India, for example, state-specific data are available.	• Intimate partner violence, like all forms of GBVH, is rooted in gender inequality, meaning that when levels of intimate partner violence are high, other forms of GBVH are likely to be high too.	• Data on intimate partner violence can be found in national DHS, based on the percentage of ever-married women who have ever experienced physical or sexual violence at the hands of their husband or partner

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Table A1 / GBVH risk factors

Risk factors related to country context		
Risk factor	**Why this increases GBVH risks**	**Potential sources of data**
National legislation	National legislation on GBVH varies considerably: • Some emerging economies have no laws on certain forms of GBVH, for example sexual harassment in the workplace. • A number of emerging economies have at least some GBV-related legislation in place, but it may be limited and poorly implemented. • In contrast, some emerging economies have comprehensive legislation in place on GBVH. This can require organisations, including those in the private sector, to take proactive measures to prevent and respond to GBVH.	• Inadequate legislation on GBVH is often a reflection/consequence of high levels of gender inequality in a society, in itself indicating higher levels of GBVH risk. • When national legislation does not comprehensively cover all forms of GBVH, this can lead to Impunity for perpetrators and an increase in GBVH risks. • A lack of legislation on GBVH can limit the actions companies can take against those who perpetrate GBVH, hindering prevention and response efforts and increasing GBVH risks.	• Information on national legislation on GBVH can be found in the the World Bank's database on Women, Business and the Law • Information on existing legislation can be found in the World Bank's Compendia of International and National Legal Frameworks
Poverty	Poverty can mean people: • Are in desperate need of basic services and employment. • Have a large number of family members dependent on their income. • Are less aware of their rights and do not know how to seek help when their rights are violated.	• Poverty can make people vulnerable to sexual exploitation due to their need for services, opportunities and resources. It can arise in situations such as applying for a job, trying to enrol in a school or being awarded compensation. • Poverty can make people vulnerable to sexual harassment and exploitation because they are desperate to keep their jobs, receive a bonus or achieve promotion. This risk can increase where alternative sources of employment or basic services are lacking, or where people are entirely dependent on one company to meet their needs. • Poverty can restrict people's access to the knowledge and resources they need to report GBVH and to seek help and protect themselves. This can reduce reporting and enable perpetrators to act with impunity.	• Data on poverty estimates from the World Bank's Poverty and Shared Prosperity 2018: Piecing Together the Poverty Puzzle
Discrimination	Discrimination varies from context to context, but is commonly experienced by people with disabilities, minority ethnic or sexual and gender minorities, refugees and migrants, and young people. Discrimination can mean people: • Have restricted access to services and resources. • Are less aware of their rights and do not know how to seek help when their rights are infringed. • Are less likely to be listened to.	• People who are excluded from employment opportunities and services can be more vulnerable to sexual harassment and exploitation. • Decision-making on the allocation of livelihoods, compensation and project benefits can create situations in which marginalised people are at greater risk of sexual exploitation. This is particularly true for situations in which national legislation precludes certain groups from accessing or owning land or assets. • Stigma and marginalisation can limit people's access to the information they need to report GBVH and seek support. For example, women who are refugees may not understand grievance mechanisms and information on these processes may not be available in languages they speak or formats they can access. • Refugees, young people and other marginalised groups may be so heavily stigmatised that even if they do report GBVH, they may be not be believed. This can reduce reporting and enable perpetrators to act with impunity. • GBVH risks can increase in companies where people from marginalised groups are only represented at the lowest levels of the firm's structure. This can reinforce power imbalances between them and better-paid workers, enabling harassment and abuse.	• Data on inclusiveness rankings from the Othering & Belonging Institute (formerly the Haas Institute) at University of California, Berkeley

Table A1 / GBVH risk factors

Risk factors related to country context			
Risk factor		**Why this increases GBVH risks**	**Potential sources of data**
Corruption	Corruption takes place when individuals or groups are able to exploit their relative position of power or access to resources to leverage a financial, political or other gain. Where corruption is commonplace, this can mean: • Access to resources or opportunities may come with informal and unreasonable conditions attached. • There may be very little transparency about how decisions are made and how resources are allocated. • Poor and marginalised groups who lack influence may be treated particularly unfairly.	• GBVH risks may be higher where corruption among local authorities is widespread. • Corruption among the police means that survivors cannot rely on reports of GBVH being treated fairly and confidentially, which may deter reporting, allowing perpetrators to continue their actions with impunity, putting survivors at risk. • Corruption among local authorities such as government officials, police and public security forces can be combined with the perpetration of GBVH, in particular sexual harassment and sexual exploitation.	• Data on perceptions of corruption from Transparency International
Fragility and conflict	In fragile and conflict-affected states, people often: • Feel under increased pressure to conform to gender stereotypes whereby men should be physically aggressive. • Have reduced access to resources and services. • Experience greater levels of discrimination, especially where it is a driver of conflict. • Experience weak rule of law.	• GBVH risks are often higher in fragile and conflict-affected countries, including the period after conflicts have ended and after humanitarian crises. These situations can increase levels of gender inequality, poverty and discrimination, all of which can increase GBVH risks. • Where the 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 weaken the deterrent for perpetrators. • In conflict situations, violence can become normalised. Sexual violence can be used as a weapon of war. Violence, including GBVH, can persist even when a conflict has officially ended. • Humanitarian crises and conflict can cause people to become displaced. Being away from families and communities can enable people to perpetrate GBVH without having to take responsibility for their conduct among people they know. • Humanitarian situations, including natural disasters and conflict, can lead to women taking on new roles, including employment outside the home. Men can perpetrate GBVH in a backlash against these changes in a bid to re-establish their traditional roles.[120]	• Fragile state classification, see the World Bank's Harmonized List of Fragile Situations

💡 Data on levels of intimate partner violence: limited, but useful

In many countries, the most commonly available data on GBVH relate to intimate partner violence. These are often collected as part of a country's demographic health survey (DHS), a nationally representative household survey conducted in around 90 countries every 4-5 years. Intimate partner violence is measured by asking women who have ever been married a series of questions about behaviours they have experienced over the past 12 months and during their lifetime. High levels of intimate partner violence can suggest that other forms of GBVH are also high in a given country and can therefore be used as a proxy indicator of GBVH risk, along with other factors. It is important to bear in mind that figures on the prevalence of intimate partner violence – or any form of GBVH – are likely to be lower than actual levels, as shame, stigma and fear lead to significant underreporting. Even so, the data can still be useful.

Table A1 / GBVH risk factors

Risks factors associated with an investment, project or operation	
Risk factor	**Why this increases GBVH risks**
Workforce	The recruitment of a large workforce, in addition to temporary, informal and migrant labour, is a common feature of several sectors, including agriculture, manufacturing and tourism. These types of labour are also prevalent during the construction phase in any sector. • In areas with high poverty levels, new job opportunities can mean workers experience a sudden increase in income and gain access to more resources than others in the local community. • Demand for labour can create a need for short-term migrant workers, sometimes living in employer-provided camps. • Workers with informal and non-standard employment status are frequently not protected by national labour laws, regulations and protections. It is common for these workers to live in fear of losing their jobs.	• New income can provide workers with greater status and power. This can create opportunities for workers to sexually exploit other community members, especially those who do not have enough money or resources to meet their basic needs. • Where male migrant workers are away from home, the absence of family and friends can mean there are fewer repercussions to perpetrating violence and harassment. • Temporary, informal and migrant workers can also be at greater risk of experiencing GBVH. They may be less likely to report GBVH for fear of losing their jobs or because they are cut off from their support networks. There may also be fewer resources and support services available for migrant workers who experience GBVH. This can enable perpetrators to act with impunity.
Seasonal deadlines	Seasonal deadlines are common in the agricultural and manufacturing sectors, particularly in the garment and food-processing industries. • In many sectors, seasonal fluctuations in workload can put companies and their workers under intense pressure to boost productivity and 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 being subject to financial penalties if they are not met.	• Managers and supervisors may use verbal harassment and physical violence as an (ineffective) way of trying to increase worker productivity. This can contribute to a general atmosphere in which GBVH is tolerated and less likely to be reported, enabling perpetrators. • Companies working to tight seasonal deadlines can attempt to incentivise productivity through performance-related pay. While 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.
Transportation of goods	Frequent transportation of goods is particularly common during construction phases and in the 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 power relative to the people in the communities they pass through and stay in.	• Drivers' income and separation from people who know them can present 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. • Drivers who are already vulnerable to GBVH, such as women or people with disabilities, may be at a greater risk of GBVH when travelling long distances through isolated communities at night.
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 resource sectors. • Workers may be required to consult with community members 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 livelihood restoration. • Construction projects may require workers to have access to spaces where community members live, work or study.	• Community engagement processes (for example during resettlement) 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 and/or already face discrimination. • 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.

Table A1 / GBVH risk factors

Risks factors associated with an investment, project or operation	
Risk factor	**Why this increases GBVH risks**
Service provision	Interaction between workers and service users is particularly common in the health, education, transport, leisure, hospitality and tourism sectors. • In some situations, workers may have considerable power over service users, particularly where they are providing life-changing services, such as in healthcare and education. • In other situations, service users may have considerable power over workers, most notably 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, they can abuse their power and sexually harass and exploit those who need access to them, especially when users are in desperate need of services that are in short supply. • Workers who rely on service users for part of their pay (tips) can be at greater risk of sexual harassment and exploitation. This 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 and are less inclined to believe workers who report GBVH. • GBVH risks are higher where workers or service users are in vulnerable positions (such as patients in hospitals). GBVH risks can increase, too, when people lack information about how to report incidents and are less likely to be listened to and believed (such as children in schools and migrant workers in hotels or bars). This enables perpetrators to act with impunity.
Security personnel	Even where an investment, project or operation is not in a fragile or conflict-affected area, public or private security personnel may be required to protect company workers, assets and worksites. This is particularly common in the infrastructure, mining and manufacturing sectors. • Security personnel are often male and can be armed, giving them greater power. • 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 protection for workers, including from GBVH, they can also abuse their positions of power and status to perpetrate it, including sexual harassment and abuse. This risk can increase when security personnel 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 sexual exploitation in return for overlooking issues they could report.[121, 122]
Isolated situations	Worksites can be located in remote and isolated areas. This is particularly common in the agriculture, forestry, mining and large-scale infrastructure sectors. • Remote locations can mean that people 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 enable perpetrators. • Worksites that are spread out over large areas can create opportunities for GBVH out of view of others, increasing the risk of physical and sexual abuse. This is also true for long journeys to and from work through remote areas. • Workers who lack access to alternative employment options can be at increased risk of GBVH. They may be highly dependent on a single company for income and as a result be less likely to report GBVH for fear of losing their jobs. This can enable perpetrators.

Annex 2: A phased approach to prevention and response

There are a range of measures that companies can take to prevent and respond to GBVH (as outlined in Section 5). Rather than attempting to introduce all of these at once, it can be helpful for companies to adopt a phased approach, initially focusing on getting the basics in place. Companies can then move on to further develop their capacity for GBVH prevention and response. Once companies are more confident – and if they have the capacity – they may decide to take a more ambitious approach to working with others to address GBVH and its root causes in the sector and in society more broadly.

Table A2 provides some suggestions for a phased approach to each of the various aspects of GBVH prevention described in Section 5.

Table A2 / Suggestions for a phased approach to GBVH prevention

Focus area	Initial efforts *Getting the basics in place to prevent and respond to GBVH*	Further action *Building capacity in companies, user groups and communities to strengthen GBVH prevention and response*	Greater ambition *Seeking to address GBVH more widely in the sector and in society*
Leadership and company culture	• Model positive behaviour and publicly commit to take reports of GBVH seriously • Understand GBVH risks and integrate them into the company's risk management system	• Allocate budget for GBVH prevention, reporting and response • Develop a diverse and inclusive organisational structure • Identify partnerships with local and national GBVH organisations and local authorities • Take steps to develop a supportive organisational culture, including establishing a top-tier focal point or committee for GBVH • Track progress and improvement on GBVH prevention and response	• Demonstrate leadership on preventing GBVH in the wider community • Share learning with others at national, sectoral or industry level
Policies and procedures	• Develop company policies and procedures to address GBVH (either as a separate policy or integrated into wider company policies) • Establish codes of conduct that cover GBVH • Ensure policies, procedures and codes of conduct are easily accessible	• Seek input from internal and external stakeholders when developing GBVH policies and procedures (for example, trade unions, worker groups, community organisations and service-user groups) • Encourage regular feedback from workers, community members and service users and adapt GBVH policies and procedures as necessary	• Establish broader policies for employees experiencing domestic violence, including intimate partner violence • Put in place employee assistance programmes for domestic violence
Grievance mechanisms and investigation procedures	• Develop safe and confidential mechanisms for grievance reporting, referral, support and investigation • Provide several reporting channels, including anonymous options • Identify qualified investigators who can safely conduct GBVH investigations when needed • Focus on the safety and wellbeing of survivors • Seek legal advice as necessary	• Provide options for people to raise grievances and seek support from trade unions and worker organisations • Seek to understand the barriers to reporting for different groups and tailor grievance mechanisms to the needs of different groups • Offer digital reporting options	• Provide access to an independent grievance mechanism – ideally a sector-specific one with trade-union involvement, where applicable

Table A2 / **Suggestions for a phased approach to GBVH prevention**

Focus area	Initial efforts *Getting the basics in place to prevent and respond to GBVH*	Further action *Building capacity in companies, user groups and communities to strengthen GBVH prevention and response*	Greater ambition *Seeking to address GBVH more widely in the sector and in society*
Recruitment and performance assessment	• Ensure interview panels are staffed by at least two people • Request at least two references (including most recent employer) • Check a candidate's identity at interview • Develop written procedures for performance appraisals, promotions and any performance-related pay (if applicable)	• Ask value-based interview questions to assess candidates' understanding of acceptable workplace behaviour • Provide a confidential self-disclosure form at interview stage • Include a short probationary period in case of concerns • Adapt worker bonus and reward schemes to remove opportunities for sexual exploitation • Conduct exit interviews with employees	• Recognise positive behaviours among workers, suppliers and community members with respect to GBVH prevention and response
Training and awareness raising	• Provide mandatory training for all staff on GBVH and company policies and procedures, including induction training for new recruits • Provide additional specialised training for those with specific responsibilities related to prevention and response • Deliver clear messaging to service users and communities on GBVH, how to report it and how reports will be handled	• Provide refresher GBVH training to workers on a regular basis • Collect and use feedback from workers, community members and service users to increase the effectiveness of GBVH training and messaging	• Provide intensive training and/or awareness-raising activities designed to transform attitudes and behaviours related to GBVH among workers, community members and service users • Use company infrastructure/services/products to challenge attitudes and behaviours with regard to GBVH in society more broadly
Work with contractors and suppliers	• Demonstrate and model the standards expected of contractors and suppliers within the company's own internal operations • Include information on GBVH risks and expectations in bid documents • Request bidders share GBVH policies and procedures • Include clauses in contracts committing contractors to adhere to company codes of conduct • Provide information to contractors and suppliers about company grievance mechanisms to report GBVH	• Map GBVH risks in the supply chain and identify any areas of influence • Include suppliers and partners in company training on GBVH • Review GBVH risks as part of contractor control management tools • Identify and put in place additional safeguards for high-risk contracts	• Collaborate with other organisations to proactively address GBVH in supply chains • Share information and examples of good practice of GBVH prevention and response with others • Develop enforceable agreements between brands, suppliers and their workers, ideally through a sector-wide approach
Physical design[123]	• Include GBVH in workplace safety assessments, including worker accommodation and transportation	• Conduct participatory safety audits that address GBVH to identify physical safety concerns for workers, service users and community members	• Offer a digital crowd-sourcing option for workers, community members and service users to map GBVH risks and inform physical design adaptations (for example, SafetiPin)

Annex 3: Questions to assess company capacity and resources

Table A3 provides a set of questions that investors can ask companies – or companies can ask themselves – when assessing their capacity and resources to prevent and respond to GBVH. These questions focus on initial efforts to get the basics in place, as described in Annex 2. Investors can integrate these questions into their standard assessment phase.

Rather than acting as a checklist, the questions can be used to facilitate a conversation between investors and investees or internally within a company. GBVH expertise is not required to use these questions, but users should have at least a basic grasp of approaches to GBVH prevention and response.

Table A3 / **Questions to ask when assessing capacity and resources to prevent and respond to GBVH**

Focus area	Questions to include in basic GBVH capacity assessments	Company documentation to verify
Leadership and company culture	• Has company leadership publicly committed to taking reports seriously?	Communication materials used by senior leadership
	• Has the company identified GBVH risks and are these reflected in the company's risk management system?	GBVH policy and related management system policies/procedures
Policies and procedures	• Has GBVH been reflected in company policy, including a clear definition of GBVH (either as a separate policy or integrated into wider policies)?	GBVH policy
	• Has the company developed clear codes of conduct that prohibit all forms of GBVH?	Codes of conduct
	• Are GBVH policies and codes of conduct available to workers and external stakeholders in accessible formats?	GBVH policy and codes of conduct
Grievance mechanisms and investigation procedures	• Are confidential grievance mechanisms in place where reports and concerns related to GBVH can be raised?	GBVH policy and response procedures Grievance policy and process Company monitoring data
	• Are accessible reporting channels available to workers, community members and service users, including anonymous options?	
	• Are procedures in place to respond to reports of GBVH when they are made, including clear investigation procedures that focus on the safety and wellbeing of survivors? Have trained investigators been identified?	
	• Have reports of GBVH been made and how have they been handled?	
Recruitment and performance assessment	• Are recruitment procedures in place, with interview panels staffed by at least two people? Are candidates' identities checked at interview and are references requested?	Recruitment procedures
	• Are written procedures in place for performance appraisals, promotions and any performance-related pay (if applicable)?	HR procedures for performance appraisals and promotions

Table A3 / Questions to ask when assessing capacity and resources to prevent and respond to GBVH

Focus area	Questions to include in basic GBVH capacity assessments	Company documentation to verify
Training and awareness raising	• Is mandatory training on GBVH and company policies and procedures provided to all workers of all grades, including contractors and security personnel, as well as induction training for new recruits?	Training material
	• Is additional specialised training provided to members of staff with specific responsibilities for GBVH prevention and response?	Training material
	• Is clear messaging provided to service users and communities on GBVH, how to report it and how reports will be handled?	Community engagement material Stakeholder engagement plan
Work with contractors and suppliers	• Is information on GBVH risks and expectations included in bid documents?	Information for bidders
	• Are bidders required to share their GBVH policies and procedures?	
	• Are clauses included in contracts committing contractors and suppliers to adhere to company codes of conduct?	Contract wording
	• Is information provided to contractors and suppliers about company grievance mechanisms for reporting GBVH?	Information for contractors
Physical design	• Is GBVH included in workplace safety assessments, including worker accommodation and transportation?	Workplace safety assessments

Annex 4: Approach for an in-depth assessment of GBVH risks

The following information is to guide companies and investors when commissioning an in-depth assessment of GBVH risks, should it be deemed necessary. Although the terms of reference will need to be tailored to the specific context, investment, project or operation, this guidance can be used to prompt thinking on how to approach such an assessment. Basic assessments of GBVH risks and company capacity and resources (as described in Sections 4.1 and 4.2) can also be used as a starting point to determine the scope of a subsequent in-depth assessment of GBVH risks.

A4.1 / Purpose and timeframe

In-depth assessments of GBVH risks provide an opportunity to better understand context-specific risk factors and to tap into local knowledge and information on support services. In-depth assessments of GBVH risks can enable investors and companies to learn more about company capacity, systems and resources to prevent and respond to GBVH.

Such assessments will need to be tailored to specific investments, projects or operations. Sufficient time will need to be allocated, so that 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 the country's GBVH risks.

A4.2 / Skills

Specialists conducting an in-depth assessment of GBVH risks will need to have:

- knowledge of the root causes of GBVH and the forms it can take

- experience of assessing, designing and/or implementing approaches to prevent GBVH

- experience of assessing, designing and/or implementing grievance mechanisms for workers, community members and/or service users.

If a GBVH expert is not available locally, it may be necessary to identify a regional or international GBVH expert to conduct an in-depth assessment of GBVH risks. Though GBVH experts should ideally have experience of the country context, it is not essential, especially if they are working with someone who has knowledge of the local social, political and legal context.

For large-scale investments, projects or operations that 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 facilitates a joint approach to the in-depth assessment of GBVH risks and can include an element of mutual learning in the form of upskilling and ongoing mentorship for the local organisation and significant local assistance and insight for the international or regional expert.

A4.3 / Approach and methodology

Once commissioned, the GBVH expert will need to:

- Develop a tailored methodology for the in-depth assessment.

- Set out clear procedures to follow if an incident of GBVH is identified during the in-depth assessment. This is particularly important, as a company may not yet have appropriate grievance mechanisms and response procedures in place.

The in-depth assessment methodology should ideally involve a desk review of existing information and on-the-ground data gathering.

A4.4 / Outputs

The outputs of an in-depth assessment of GBVH risks could include:

- an explanation of GBVH risks for the investment, project or operation

- a description of company capacity and resources to prevent and respond to GBVH, with an explanation of capacity gaps and weaknesses

- a detailed set of GBVH prevention measures

- a detailed set of actions to encourage and ensure that reports are responded to safely and appropriately

- a set of KPIs against which risks and the effectiveness of prevention and response measures can be tracked.

Table A4 / **Examples of data-collection methods for in-depth assessment of GBVH risks**

Method	Examples of stakeholders to include
Key informant interviews	• Company personnel, for example: 　• owners and significant shareholders 　• senior managers and supervisors 　• HR staff and community liaison officers 　• health and safety personnel 　• security personnel and those providing worker transportation 　• worker representatives and trade unions • Staff from local women's rights organisations and organisations representing other marginalised groups, for example, disabled people's organisations, LGBTQI+/transgender rights organisations • Staff from international and local NGOs working on GBVH • Health workers on site or in local communities • Representatives of government departments
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, including grievance mechanisms, made clearly available to workers, community members and service users.
Desk review of secondary data	• GBVH policy, procedures and codes of conduct • Grievance policy and process • Company monitoring data • Training material and feedback forms • Recruitment and HR procedures • Community engagement material and stakeholder engagement plan • Workplace safety assessments • Information for bidders and contractors, and contract wording

Annex 5: Integrating GBVH into ESDD and ESIAs

Environmental and social due diligence (ESDD) and environmental and social impact assessments (ESIA) vary significantly depending on the project to be appraised. There are, however, standard elements that are covered in most ESDDs or ESIAs, whether they follow IFC or EBRD standards or similar (such as the Equator Principles).[124] This annex does not provide terms of reference, but suggests GBVH considerations that can be incorporated into ESDDs and ESIAs.

A5.1 / Key aspects

- GBVH needs to be considered from the initial feasibility, scoping and planning phases to facilitate an early indication of the level and nature of potential GBVH risks, so as to ensure that the project can be adapted accordingly.

- An **early review of the project description**, its design features and its associated facilities is important, to assess whether it has features that will create circumstances where GBVH can occur, such as:
  - management of existing or new employees
  - potential interaction between employees and communities
  - supply chains that have risks of GBVH
  - design of infrastructure (lighting, access, rest areas, etc.)
  - any other features relevant to project design.

- GBVH risk indicators should be taken into account in the **planning of social assessments and baseline data collection**. Typically, this would include the legal context and the local socio-economic and political context, incorporating issues such as:
  - gender disaggregated demographics/profile and analysis (social dynamics and imbalances of power between genders at community, household and intra-household level, female-headed households, migration impacts)
  - cultural norms – gender norms and value systems
  - poverty levels and vulnerable persons
  - fragile and conflict states
  - prostitution
  - intimate partner violence
  - prevalence of GBVH
  - local labour market
  - local authorities, police and security services
  - third-party supply chain
  - other relevant issues

(See Annex 1 for details of GBVH risks.)

- The ESIA process, particularly the data-collection phase, should include stakeholder engagement with affected communities and their representative groups and focus-group discussions with different genders to explore their potential concerns about GBVH. Care should be taken in any consultation process to ensure that it is sensitive to social norms and does not create tensions within the community. Views and concerns from the consultation should be taken into account in the impact assessment, planning and implementation of the project.

- Impact assessment – GBVH risks and prevention measures should be mainstreamed into the overall ESDD or ESIA). Topics that may require assessment with a GBVH lens include (but are not limited to):
  - labour and working conditions
  - local recruitment
  - labour influx
  - gender analysis
  - worker accommodation
  - worker-service interface
  - community health and safety
  - security arrangements
  - land acquisition and involuntary resettlement

- Should the need for a specific in-depth GBVH assessment be identified during the scoping stage (either for an ESDD or ESIA), this should be subject to separate terms of reference using GBVH specialists. For an ESIA, the GBVH specialist studies should be integrated into the subsequent impact assessment and management plan of the ESIA.

- The ESDD or ESIA should cover all of the project lifecycle and take into account the potential variations in GBVH risks from the construction phase (for example, a migrant workforce influx) to the operational phase to project closure (for example, security workers and transient drivers in rural and isolated communities during operations). It should also consider cumulative impacts, such as the number and type of construction projects in a region, which may lead to significant worker influx and heightened concerns over GBVH risks.

A5.2 / Mitigation measures and monitoring

Environmental and social management plans (ESMPs) or environmental and social action plans (ESAPs) include mitigation measures to be applied to a project to meet good international practice and lender standards. Based on the outcomes of the impact assessment, GBVH could be integrated into a number of plans, procedures or processes defined within the ESMP, such as:

- contractual requirements for GBVH to be integrated into company or contractors' systems, plans and procedures

- policies on GBVH to safeguard workers and community members

- the allocation of roles and responsibilities for gender- and GBVH-related issues and investigation within the project, including a focal point for GBVH

- training on codes of conduct, local customs and appropriate interaction with communities

- worker grievance mechanism – with specific GBVH provisions in line with this guidance

- an occupational and community health and safety plan

- a labour and working-conditions management plan – with local content requirements (local hiring)

- the integration of GBVH considerations into HR (including recruitment and supplier auditing), incident reporting and investigation systems, including a confidential system to record and investigate all harassment

- induction training on codes of conduct, gender sensitivity, GBVH, use of local force and cultural sensitivities

- security-guard training on codes of conduct GBVH provisions, the Voluntary Principles on Security and Human Rights, cultural norms and expectations

- a worker accommodation plan – application of IFC/EBRD worker accommodation standards ensuring separate, lockable toilets; adequate lighting in the evening for workers walking from dormitories to canteens; and safe access arrangements to site and accommodation

- stakeholder engagement plans that ensure the information disseminated on codes of conduct, GBVH and grievance mechanisms is in a language and format that is understandable by all parties (communities and workers)

- a community-based grievance mechanism that is well disseminated, accessible and trusted and a system to track the resolution of queries and complaints.

- Organisational capacity and management systems – ESDDs or ESIAs should include a review of the plans and procedures a company or contractor would use to address GBVH-related issues, such as:

  - HR policies to address the management of GBVH risks

  - codes of conduct on GBVH, alcohol and drugs

  - a worker grievance mechanism covering all workers on a project, with a guarantee of confidentiality

  - a community grievance mechanism

  - worker accommodation

  - supply-chain management

  - other relevant issues.

- Project monitoring and reporting – it is important that the appropriate resources are provided to support a confidential system to address GBVH allegations and incidents, supported by training and awareness raising. Reporting requirements on the effectiveness of the implementation of policies, systems and procedures need to be outlined in the ESDD or ESIA.

Annex 6: Template for a company GBVH policy

Table A6 suggests a template for company GBVH policies. As explained in Section 5, companies may choose to integrate their policy on GBVH into existing policies or to have a separate policy or policies on GBVH. Either way, the template offers examples of the information companies may want to include.

Table A6 / **Template for company GBVH policy**

Section	Content to include
Purpose	State the **definition** of GBVH the company is using, as well as any other specific, related terms, such as sexual harassment. List **those to whom the policy applies** (including stating explicitly that it covers all workers, regardless of their contractual status, including employees, temporary contractors, interns, volunteers and candidates). Cite any other **relevant policies and procedures** linked to the policy (for example, procurement, whistleblowing, health and safety, or equal opportunities).
Commitment	State that GBVH is **not acceptable** and is **not tolerated** by the company, including a statement of company commitment to GBVH prevention and response. Explain how this links to the company's mission statement, values and principles. Explain what the company aims to achieve in terms of **company culture** to prevent GBVH, to encourage reporting and to support survivors, witnesses and whistleblowers.
Legislation	List any relevant **international and national** legislation and standards that the company will follow. State company and individual **responsibilities under relevant legislation**.
Behaviour	Provide a list of: • **behaviours that are expected of workers** to prevent and respond to GBVH (for example, to report GBVH, to treat all people with respect, to participate in GBVH training, to read company policies on GBVH, to respect confidentiality, etc.) • **GBVH behaviours that are illegal** under national law • **GBVH behaviours that are not permitted** by the company, even if they are not a crime (including physical, verbal, non-verbal and sexual behaviour, false accusations of GBVH). Outline the **settings to which the lists of behaviour apply**, with a list of specific examples, such as the workplace, travelling to and from work, employer-provided accommodation, communications, work-related social events, training and travel. Provide **examples of behaviour** that constitute GBVH and are relevant to workers, the wider supply chain, community members and service users, as appropriate. Note that these examples are not exhaustive. State the **company's position on prostitution**. State that **sex with children** under the age of 18 is not tolerated.
Sanctions	Describe the **sanctions in place** for those who perpetrate GBVH and violate the policy. Draw clear **links to company disciplinary procedures** and signpost relevant documents.
Training	Outline the GBVH **training** provided by the company, including that for all workers and that included in induction. State the **mandatory requirement** for all workers to participate. Outline **enhanced training** for those with specific roles in GBVH prevention and response.
Reporting	State the company's **commitment to encouraging, enabling and supporting the reporting** of GBVH. Outline company **grievance mechanisms** and reporting channels, including the responsibilities of specific staff. Outline company **response procedures**, including investigation procedures, with reference to other relevant company policies, as needed, including the responsibilities of specific staff. State the company's **commitment to maintain confidentiality**, with examples of what that means in practice. Make links to company disciplinary procedures for those who break confidentiality rules. Outline how **data will be captured and managed**. State the company's position on **dealing with false accusations** of GBVH, with links to disciplinary procedures.
Support	List **support services** available to survivors, including links to service providers, trade unions, health services, women's right's organisations, NGOs and government agencies. Outline potential **safety measures** available to those who experience or report GBVH and/or who participate in an investigation, including measures to protect against reprisal.
Signature	Leave space for workers **to sign** the policy and state that they have understood its content. Reference the process for workers to **request further clarification** on the policy, if required.

Annex 7: GBVH grievance mechanisms and investigation procedures

Table A7 outlines points to consider when developing GBVH grievance mechanisms and investigation procedures.

Table A7 / GBVH grievance mechanisms and investigation procedures

	Grievance mechanisms	Investigation procedures
Designing a new mechanism *or* **Updating an existing mechanism to incorporate GBVH**	• **Design reporting channels suited to the company's GBVH risks and groups**, including communities and service users. • **Consider which groups might wish to report and what is accessible for them.** A one-size-fits-all approach is unlikely to be effective. • **Design accessible and culturally appropriate ways to report**, for example, in local languages, taking cultural sensitivities into account or tailored to people with special needs. • **Include information for survivors about support services** and safety measures available. • **Plan how the organisation will protect confidentiality,** including anonymous reporting. Ensuring confidentiality is a key consideration at all stages of the process.	• **Identify qualified investigators** with a diverse range of characteristics, who the company can commission to conduct GBVH investigations as needed. This could include HR firms, legal firms, specialist consultancies or international NGOs. • **Establish clear procedures** to follow when a report of GBVH is made and outline the process for deciding whether a formal investigation is required, with an emphasis on maintaining confidentiality from the start. • **Work with qualified investigators to document an investigative approach** that ensures confidentiality and includes sufficient flexibility to accommodate the wishes of survivors.
Implementation	• **Take a phased approach if necessary.** Consider the greatest GBVH risks and which groups may be most vulnerable. Establish accessible mechanisms in these areas first if resources are constrained. • **Let people know that they have a right to report a concern related to GBVH, how to do so and the process that would ensue.** Communicate clearly and repeat the message. Plan how this communication will be managed and monitored across all operations. • **Update complainants regularly**, including on expected timeframes, and provide prompt responses to any questions. • **Provide information on the support and safety measures available**, including through worker representatives, trade unions and local organisations (while maintaining confidentiality). • **Identify a pool of individuals with diverse characteristics that will be responsible** for the company's response to reports (male and female, for example). • **Include worker representation** in any grievance committees and provide the option for workers to have a representative or co-worker present. These steps help reduce power imbalances within a management-led grievance mechanism. • **Ensure protection for those workers on grievance committees** so they are not at risk of losing their jobs or being harassed because of their involvement. • **Roll out mandatory training and provide guidance** for all those who might receive a report. Equip workers with guidance appropriate to their role in responding to reports.	• **Make appropriate resources available** to implement the company's investigation procedures and ensure qualified investigators are used to conduct all investigations. • **Inform alleged perpetrators that there is an allegation** against them and give them an opportunity to respond. • **Maintain confidentiality throughout investigations**, clearly defining what this means at a practical level in terms of exactly what information can be shared, when and with whom. • **Make decisions about whether it is necessary to suspend a potential perpetrator** while an investigation takes place and identify any other support and protection measures needed for everyone involved. • **Ensure survivors, witnesses and alleged perpetrators are aware of the company's appeal mechanism** and understand how to use it.
Learning and review	• **Review all related policies and procedures** to ensure that they are aligned, for example, policies for reporting, disciplinary action, whistleblowing and codes of conduct. • **Publish data on complaints and investigations in a confidential way** that does not reveal the identity of the parties involved, for example, by including the number of reports in the company's annual report. • **Seek input from others where appropriate,** for example, from trade-union representatives, local NGOs and GBVH experts.	

Annex 8: KPI examples

Table A8 presents examples of the types of KPI that companies and investors could use in order to track GBVH risks, as well as the effectiveness of efforts to prevent and respond to GBVH. Rather than taking on board the full set of indicators, companies and investors may want to choose those they find most useful and relevant and adapt them to ensure they are appropriate both to the local context and company operations.

Table A8 / **Examples of GBVH-related KPIs**

KPI	Measure	Source of data
Reporting		
Number of reports of GBVH received through company grievance mechanisms	Number	Reporting records
Percentage of reports of GBVH investigated in the past year	%	Reporting records
Leadership		
Percentage of workers who think the company is committed to addressing GBVH	%	Staff survey
Percentage of workers who think senior management demonstrates commitment to addressing GBVH	%	Staff survey
Percentage of community members/service users who think the company is committed to addressing GBVH	%	Community/service-user survey
Budget allocated to GBVH assessment, prevention, response and monitoring efforts	Number	Company accounts
Budget allocated to local GBVH support services	Number	Company accounts
Accessibility		
Policies, procedures, training and awareness-raising materials translated into relevant languages and in accessible formats	Qualitative	Company policies, procedures, training and awareness-raising materials
Policies and procedures		
Percentage of workers who know where to find company policies and procedures on GBVH	%	Staff survey
Percentage of workers who have signed the company codes of conduct	%	HR records
Percentage of workers who say they understand the company's policies and procedures on GBVH	%	Staff survey
Feedback from workers on whether they understand and agree with what is included in company codes of conduct	Qualitative	Staff survey
Percentage of community members/service users who know that company workers are meant to follow a code of conduct	%	Community/service-user survey
Feedback from community members/service users on whether they understand and agree with what is included in the company code of conduct	Qualitative	Community/service-user survey
Training and awareness		
Percentage of workers who have attended GBVH training	%	Training records
Number of workers who have received enhanced GBVH training for specific roles (for example, responding to reports)	Number	Training records
Percentage of workers who say they understood the information provided in company GBVH training	%	Training feedback forms
Percentage of workers who say they found company GBVH training helpful	%	Training feedback forms
Feedback from workers which shows improved knowledge on GBVH as a result of the training	Qualitative	Training feedback forms and/or interviews
Feedback from workers on the accessibility, relevance and usefulness of company GBVH training	Qualitative	Staff survey
Number of community members/service users reached through company GBVH-related awareness raising activities	Number	Community/service-user engagement records
Feedback from community members/service users on the accessibility, relevance and usefulness of company GBVH-related awareness raising activities	Qualitative	Community/service-user survey
Safety		
Percentage of workers who feel safe at work	%	Staff survey
Percentage of workers who feel safe travelling to and from work	%	Staff survey
Percentage of workers who think GBVH risks at work have decreased	%	Staff survey
Percentage of community members/service users who feel safe when interacting with the company	%	Community/service-user survey
Percentage of community members who feel less safe since investment activities/company operations started	%	Community survey

Annex 9: International and regional conventions and commitments on GBVH

1958: **UN Discrimination (Employment and Occupation) Convention No. 111** covers sexual harassment as a form of sex discrimination.

1979: **The UN Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW)** recognises GBV as a form of discrimination that seriously inhibits women's ability to enjoy rights and freedoms on a basis of equality with men.

1989: **The UN Convention on Indigenous and Tribal Peoples Convention No. 169** specifically prohibits sexual harassment in the workplace.

1989: **The UN Convention on the Rights of the Child (UNCRC)** sets out the rights of every child, including the right to be safe from violence.

1993: **The UN Declaration on the Elimination of Violence Against Women (CEDAW)** defines violence against women as including sexual harassment and intimidation at work.

1994: **The Organization of American States Inter-American Convention on the Prevention, Punishment and Eradication of Violence against Women (the Convention of Belem Do Para)** defines violence against women as "any act or conduct, based on gender, which causes death or physical, sexual or psychological harm or suffering to women, whether in the public or the private sphere".

1995: **The UN Beijing Declaration and Platform for Action** recognise sexual harassment as a form of violence against women and as a form of discrimination.

2003: **The African Union Maputo Protocol on the Rights of Women in Africa** affirms women's rights in many areas and is binding on African Union members, requiring them to address laws, policies and culture so that these rights may be realised. Unlike CEDAW, the Maputo Protocol specifically addresses violence against women and girls, requiring the state parties to prohibit all forms of violence against women and to adopt all necessary measures to ensure the prevention, punishment and eradication of all forms of violence against women.

2006: **The UN Convention on the Rights of Persons with Disabilities** calls for ratifying states to take all appropriate legislative, administrative, social, educational and other measures to protect persons with disabilities, both within and outside the home, from all forms of exploitation, violence and abuse, including gender-based aspects.

2008: **The UN CEDAW Committee adopts General Recommendation No. 26 on Women Migrant Workers**, recognising that women migrant workers are more vulnerable to sexual abuse, sexual harassment and physical violence, especially in sectors where women predominate and that their access to justice is often limited. It issues a series of recommendations to protect women migrant workers in countries of origin, transit and destination.

2010: **UN Recommendation on HIV and AIDS No. 200** includes actions to prevent and prohibit violence and harassment in the workplace in order to reduce the transmission and alleviate the impact of HIV.

2011: **UN Convention on Decent Work for Domestic Workers No. 189** requires ratifying states, employers' and workers' organisations to take action against any form of violence, abuse and harassment at work.

2011: **The Council of Europe Istanbul Convention** requires ratifying states to accept responsibility to prevent all forms of violence against women, to protect those who experience it and to prosecute perpetrators.

2012: **The Pacific Islands Forum Gender Equality Declaration of 2012** (reaffirmed in 2015) commits to implementing specific national policy actions to progress gender equality in a number of areas, including economic empowerment and ending violence against women.

2015: **UN Recommendation on Transition from the Informal to the Formal Economy No. 204** calls for the adoption of a comprehensive policy framework that includes the promotion of equality and the elimination of all forms of discrimination and violence, including gender-based violence, in the workplace.

2019: **UN Convention on Violence and Harassment in the World of Work No.190 and Recommendation No. 206** emphasise the need for urgent and meaningful action to address GBVH and recognise the vital role to be played by the private sector.

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