Guidance Note for Proparco's Clients: Preventing and Addressing Gender-Based Violence and Harassment (GBVH)

Introduction

Gender-based Violence and Harassment (GBVH) prevention is embedded within Proparco financing agreements and requirements. This Guidance Note (GN) is a tool to support Proparco's clients in implementing effective strategies for preventing and addressing GBVH in company operations within the workforce (internally) and in the supply chain and community (externally). This GN includes an overview of the meaning and impacts of GBVH, how to undertake a GBVH assessment, mitigation measures and how to establish internal (workforce) and external (supply customer/community) GBVH grievance mechanisms.

What is GBVH?

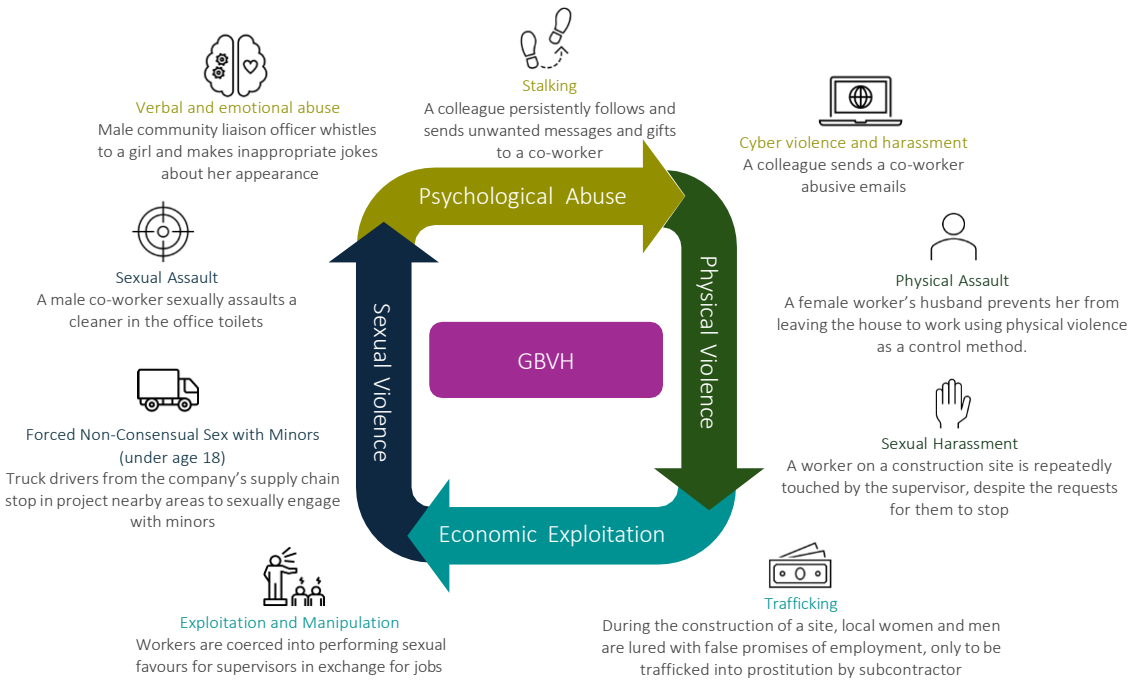
GBVH is an umbrella term for *"violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment"*[1]. It includes sexual exploitation and abuse (SEA)[2] involving the abuse of power for sexual purposes. GBVH can be an isolated incident, a repeated behaviour, or a persistent pattern. While women and girls are disproportionately affected, GBVH can affect anyone.

Source: International Labour Organization and Lloyd's Register Foundation 2022[3]

GBVH can occur anywhere and in any sector. It manifests in various ways based on risk factors such as local political, socio-economic and gender disparities, as well as operational risks such as the workforce composition, company approach to safeguarding, size and complexity of the supply chain, and the location.

Key terms used for GBVH management are provided in GBVH Terms.

This figure shows some examples of how GBVH can manifest in projects/businesses:



Source: Rise Sustainability Consulting, 2024

[1] Convention Concerning the Elimination of Violence and Harassment In The World Of Work, Geneva, 21 June 2019 (available at: https://normlex.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)

[2] SEA occurs in a work or work-related environment, including program settings and work travel. SEA is often used interchangeably with GBVH. Most DFIs use the term GBVH, while SEA is more commonly used in the NGO context.

[3] Experiences of violence and harassment at work: A global first survey (available at https://www.ilo.org/publications/major-publications/experiences-violence-and-harassment-work-global-first-survey)

The consequences of GBVH are far-reaching, affecting multiple aspects of a person's life including:

Physical Health	Mental Health and Well-being	Sexual and Reproductive Health	Economic Status
Injuries, long-term health issues, disabilities and fatality.	*Depression, anxiety, post-traumatic stress disorder, and suicidal thoughts or suicide.*	*Unwanted and/or teenage pregnancies, damage to internal reproductive organs and sexually transmitted infections.*	*Undermining financial autonomy and control over personal resources.*

GBVH can have detrimental human and financial consequences, and risks should therefore be managed in proportion to the size and nature of the business.

Why Is Managing GBVH Risks Important To Your Business?

GBVH prevention and redressal is essential for maintaining a positive business environment, safeguarding the workforce, protecting the company's reputation and enabling financial performance. Below are the main ways that GBVH can affect company performance.

Lack of Access to Market

Example: An EPC company was refused operating licences in countries with stringent labour laws due to non-compliance with GBVH regulations

Reputational Damage, Litigation & Access to Finance

Example: A private transport company faced allegations of sexual harassment during service operations resulting in litigation, reputational damage and their ability to access lender financing

Reduced Productivity and Poor Retention

Example: A retail chain faced a high employee turnover, higher rates of poor performance and increased absenteeism due to unresolved cases of sexual harassment among its workforce

Health and Safety Risks

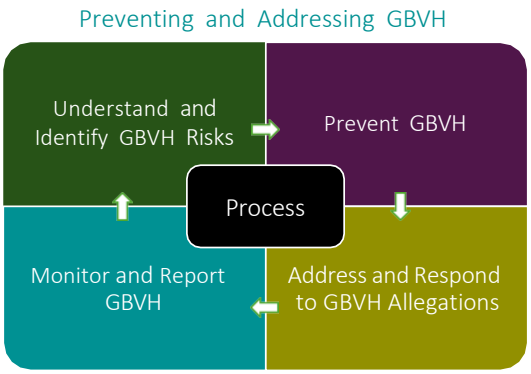
Example: A manufacturing company experienced major health and safety risks due to distracted workers affected by sexual abuse from several production line workers

Source: Rise Sustainability Consulting, 2024

Risks must be identified and managed with appropriate safeguards in place.

How to Iden)fy, Prevent, Address, Respond, and Monitor GBVH

- Understand and identify GBVH risks: Undertake a GBVH risk assessment to identify key factors that may trigger or exacerbate GBVH.
- Prevent GBVH: Develop policies and procedures, as well as raise awareness and undertake training. Develop a GBVH Action Plan to mitigate risks.
- Address and respond to allegations: Safety and confidentiality is key in responding to GBVH in order to avoid retaliation or marginalisation of those affected. A survivor-centered approach[4] should be taken in grievance redressal.



- Monitor and report GBVH: Establish key indicators for monitoring GBVH mitigation measures and develop reporting tools to track incidents.

The nature and magnitude of GBVH risks vary, necessitating the need for assessments to identify the ways that GBVH may occur based on the context, and the potential consequences.

GBVH Assessment and Ac/on Plan

A GBVH Assessment is a systematic process designed to identify, understand, and mitigate GBVH risks in investments and at the project level looking at the internal context (in the workforce) and externally (community and supply chain), as well as the capacity and resources to prevent, address and respond to them.

Developing a GBVH Assessment and GBVH Action Plan Involves the following activities.

1 Determine Assessment Approach	• Undertake a desk study to understand the regional and operational context to determine the need for a more in-depth assessment (if the risks seem high). • If an in-depth assessment is required, develop an approach with a GBVH expert that considers confidentiality and ethics in data collection. In some cases, a GBVH risk study can be conducted in parallel with other project assessments (e.g., Environmental and Social Impact Assessment or Community Needs Assessment).
2 Data Collection & Engagement (contextual understanding)	• Gather data on a) Local gender context and vulnerabilities b) GBVH prevalence and reported incidents (e.g., quantitative data on reported GBVH cases), c) perceptions from community/workforce (e.g., surveys of awareness, barriers to reporting), d) policies and procedures (e.g., HR) • Consult internal stakeholders (e.g., HR personnel, management, workforce representatives) and external stakeholders (e.g., community leaders, women organizations, NGOs, government agencies) • Where possible, undertake anonymous surveys using online tools (e.g., Google Forms) to enable an open channel
3 Develop GBVH Action Plan	• Compile findings into a GBVH assessment and baseline for monitoring • Develop a GBVH Action Plan that includes monitoring measures, key performance indicators, responsibilities and timeframes. KPIs should be tailored to the project's scope, scale, and local context to track progress and assess the effectiveness over time.
4 Implementation	• On-board trained resources to lead GBVH plan implementation and supporting focal points. • Raise awareness through training, internal engagement with suppliers and communities as appropriate. strategies and engagement • Update policies and procedures, in line with the plan • Addressal and responsive measures, such as a clear and safe reporting mechanism and referral pathway to facilitate a prompt, sympathetic and culturally appropriate response • Establish survivor-centred support systems, such as partnerships with local organisations to support survivors and witnesses (e.g., medical, counselling, legal aid)
5 Monitor & Evaluate	• Continuously monitor GBVH risks and the effectiveness of implemented measures using the developed KPIs. Regularly evaluate and adjust the GBVH Action Plan based on feedback and changing circumstances.
6 Transparency and Accountability	• Conduct transparent and confidential reporting on GBVH incidents and responses. • Demonstrate commitment to GBVH prevention and redressal by communicating efforts to stakeholders (e.g., lenders, workforce, community, government and others)

Source: Rise Sustainability Consulting, 2024

[4] People affected by GBVH are referred to as 'survivors' to highlight their strength and resilience. This approach shifts the focus from helplessness to empowerment and recovery. It fosters dignity, respect, and support, encouraging healing and reinforcing people's ability to overcome adversity.

It is important to have trained professionals on board to support GBVH assessment and build capacity to enable a safe and ethical approach that does not put participants at risk of harm during data collection.

The following actions will contribute to creating an enabling and safe environment and should be implemented in proportion to the risks identified. It is important to note that GBVH can be more prevalent in some cultures and sectors than others. Therefore comprehensive training and mechanisms will need to be implemented to support implementation and create behavioural change.

Source: Rise Sustainability Consulting, 2024

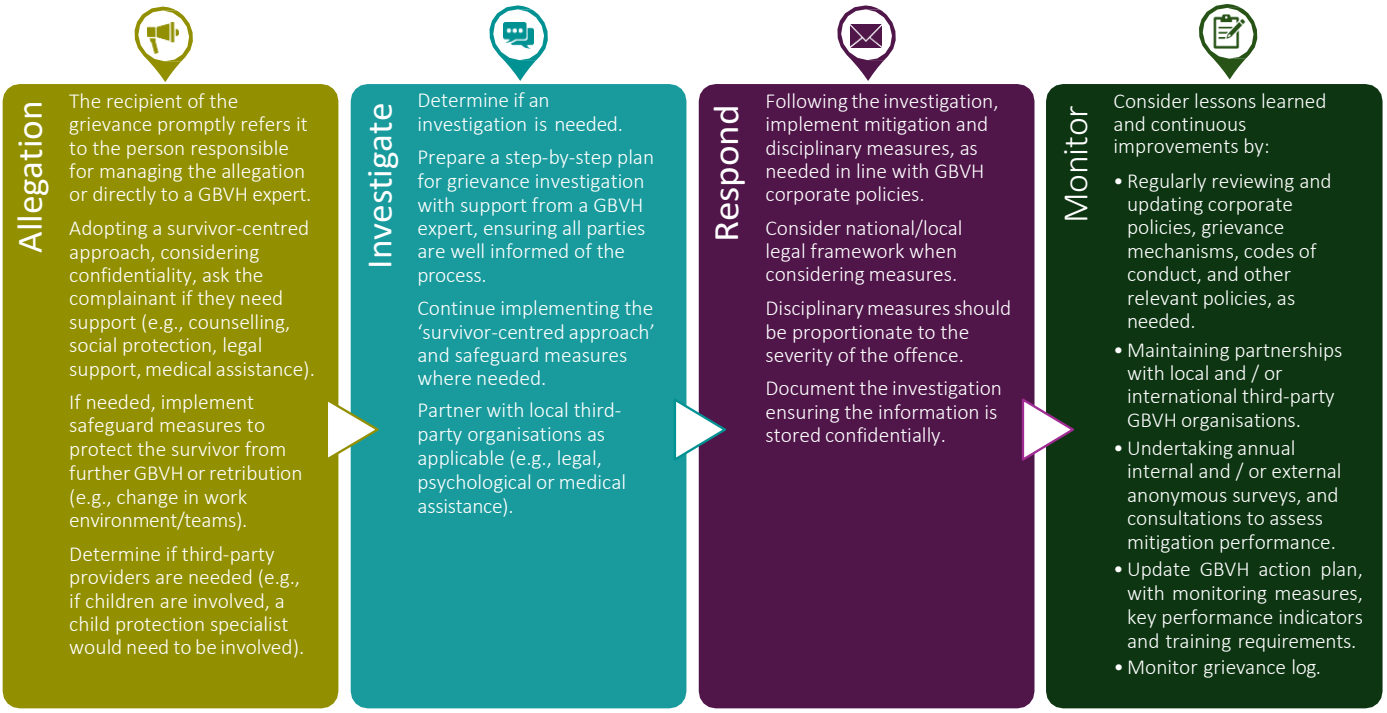
Establishing a GBVH Grievance Mechanism

Establishing a robust Grievance Mechanism enables allegations to be promptly addressed by qualified experts and effective measures are implemented to prevent harm and recurrence. The grievance mechanism should draw on local and third-party resources to act as a referral pathway for reports and provide survivor support. Useful GBVH directories are 'No More' (https://nomoredirectory.org) and resources for survivors are available at 'Me Too' (https://metoomvmt.org/how-can-we-help-you/).

Addressing GBVH allegations should be done with care adopting a survivor-centred approach, and based on the following principles:

Survivor-centered approach	• *Allegations investigated based on the survivors needs and preferences, as well as creating an enabling environment where they are heard and respected.*
Do No Harm	• *A professional and sensitive approach should be maintained throughout the investigation without risk of causing further trauma or harm.*
Safety and Confidentiality	• *Prioritise the safety and confidentiality of the survivor by undertaking investigations in safe spaces and implementing formal procedures to manage sensitive information.*
Expert-Led	• *Collaborate with trained professionals and / or local organisations to ensure allegations are conducted appropriately and to create awareness of available support measures, such as legal counselling and medical assistance.*
Planned and Gradual Implementation	• *Step by step approach that enables careful planning and avoids rushed or extensive actions that could harm survivors or prove ineffective.*

A step-by-step process for addressing allegations is presented below and should be adapted according to the situation, bearing in mind the key principles. Embedding a survivor-centred GBVH reporting mechanism within the GM necessitates thoughtful planning and execution, as follows:



Source: Rise Sustainability Consulting, 2024

Key elements of establishing and implementing a GBVH grievance mechanism and referral pathways include:

- ✓ Worker and Community Grievance Mechanisms: Implement accessible and culturally sensitive GMs tailored for both employees and community members.
- ✓ Clear Guidance: Detailed guidance to trained experts on which incidents should be reported, what essential data should be collected, and strict confidentiality protocols.
- ✓ Multiple Submission Channels: Provide various reporting channels for submitting complaints, including anonymous claims. This includes accessible online platforms, anonymous hotlines, and in-person meetings with designated HR managers and Community Liaison Officers.
- ✓ Trusted Resources: Designate trained GBVH focal points and resources to raise awareness and enhance trust in the GM, in particular among women and vulnerable groups.
- ✓ Investigation Procedures: Establish transparent investigation protocols with clear timelines and defined responsibilities to ensure consistency and fairness in handling cases. Ensure all parties involved are promptly informed of investigation progress and outcomes, maintaining transparency and accountability.
- ✓ Wide Dissemination: Ensure comprehensive dissemination of the GM throughout the workforce and externally. This includes conducting regular training sessions and providing materials (e.g., booklets, online resources, social media pages, etc) to educate stakeholders about the GM's purpose, procedures, and confidentiality protocols.
- ✓ In-house and Third-party Providers: Utilise a mix of internal experts and third-party providers who are well-trained and capable of conducting thorough investigations as required. Recognise the necessity of impartial third-party investigations in certain cases, even when internal staff are trained.

Important Notes

The absence of GBVH reports doesn't imply the absence of GBVH or its risks. It is essential to distinguish between GBVH risks (potential occurrences) and GBVH reports (specific incidents or concerns raised).

Companies and investors should proactively prevent GBVH and encourage reporting while preparing reactive measures to respond effectively and mitigate impact when incidents occur

Ongoing GBVH Monitoring and Repor)ng

GBVH risk monitoring is paramount to enable effective GBVH management. As new risks may emerge and existing ones evolve, regular risk reassessment becomes imperative to maintain an ongoing understanding of the country and project risks. This monitoring process not only helps companies identify areas needing improvement in prevention and response efforts but also provides assurance to investors (Proparco) that meaningful actions are being taken. KPIs provide measurable benchmarks against which progress in GBVH prevention and response can be evaluated such as incident reporting rates, response times, training effectiveness, and the implementation of policy enhancements. Regular internal reporting ensures that decision-makers are informed of trends and challenges, facilitating informed adjustments to strategies and interventions as needed.

Guidance Note Take-Aways

Here are the key takeaways from this GN that will help mitigate and address GBVH in your company, ultimately creating a safer and more productive environment for everyone.

- Addressing GBVH is essential to avoid: a) reputational damage, litigation and access to finance, b) health and safety risks, c) Reduced productivity and retention, d) lack of access to market.
- The safety of survivors in GBVH risk assessment and grievance is paramount in preventing harm and retaliation.
- GBVH prevention requires a commitment to conscious and proactive leadership, the implementation of detailed and comprehensive GBVH policies, and ongoing training.
- Establishing supportive frameworks is crucial to prioritize the safety and non-retaliation of all stakeholders, encompassing the workforce, contractors, supply chain partners, service users, and communities.
- Monitoring is paramount to assess GBVH management performance and prevalence, as well as the identification of new or evolving risks.

Proparco Tools and Technical Assistance

Proparco has actively investigated the prevalence of GBVH in various sectors and countries. Clients can benefit from Proparco's Technical Assistance facility and tools for conducting their own GBVH assessments in Proparco-financed projects. Click here to find out more (Gender equality | Proparco - Groupe Agence Française de Développement). Proparco Project teams also include E&S specialists who will be able to provide some guidance on preventing and managing GBVH-related topics.

Note that Proparco is not responsible for identifying, conducting due diligence (DD) or recruiting such organisations. Investees are responsible for mapping and checking the experience and capacity of reputable GBVH organisations, as well as conducting staff background checks as part of the onboarding and DD process.

Addi)onal Resources

- GBV Risk Score developed by the Criterion Institute with Equilo and UNICEF: https://www.criterioninstitute.org/resources/gender-based-violence-risk-score. A tool to assess gender-based violence risks in investments.
- BII GBVH toolkit: https://toolkit.bii.co.uk/esg-topics/gender-based-violence-and-harassment. A toolkit addressing gender-based violence and harassment within ESG frameworks, including sector specific guidance notes.
- BII, IFC, EBRD: Addressing Gender Based Violence and Harassment. Emerging Good Practice for the Private Sector: https://www.bii.co.uk/en/news-insight/insight/articles/addressing-gender-based-violence-and-harassment. A report on emerging good practices for the private sector to address GBV and harassment.
- UN proposed policy on GBV and the workplace: https://www.un.org/womenwatch/uncoordination/documents/proposedpolicy-genderbasedviolence.pdf. A policy framework for addressing gender-based violence in workplace settings.
- United Nations Global Database on Violence Against Women: https://data.unwomen.org/global-database-on-violence-against-women/data-form. Provides country specific GBVH data.
- IFC Guidance notes on establishing workplace and community based grievance mechanisms: https://www.ifc.org/en/insights-reports/2020/publications-gpn-addressinggbvh. Guidance on establishing effective grievance mechanisms for workplace and community-based GBV.
- No More Directory: https://nomore.org. A directory of organisations and resources focused on ending domestic violence and sexual assault globally.

GBVH Terms

Gender	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 recognised genders.
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.
Host community	A community that hosts a project or displaced persons associated with a project.
Sexual Exploitation, Abuse and Harassment	Refers to sexual exploitation, abuse and sexual harassment. SEAH always occurs in a work environment, or work-related environment, including in a programme setting or work travel.[5]
Sex	Refers to the external physical differences that act as a marker upon which male or female sex is assigned at birth.
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.
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.
Sexual abuse / Child 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 child sexual abuse or underage sex, regardless of the age of maturity or consent locally. Claiming to have misunderstood the age of a child cannot be defended in a court of law.
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.
Sex worker	Persons who receive money or goods in exchange for consensual sexual services or erotic performances, either regularly or occasionally. While the term 'sex worker' recognises that sex is work, the term 'prostitution' connotes criminality and immorality. Sex workers sell sexual services as a livelihood either because it is the best option they have due to poverty, because it offers better pay and flexible hours compared to other jobs, or as a way to express their sexuality. [6]
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. *Note: Terminology between survivor and victim is debated and depends on the perception of the affected individual. Persons subject to GBVH can be affected in many ways, physically and mentally, depending on the severity and nature of the incident.*
Survivor-centred approach	People affected by GBVH are referred to as 'survivors' to highlight their strength and resilience. This approach shifts the focus from helplessness to empowerment and recovery. It fosters dignity, respect, and support, encouraging healing and reinforcing people's ability to overcome adversity.
Transactional sex	Transactional sex relationships are non- commercial, non-marital sexual relationships motivated by the implicit assumption that sex is exchanged for material goods or other benefits.[7]
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.
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. 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.

Source: Terms are mainly adapted from the IFC, EBRD and BII 2022, Good Practice Note: Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector (available at: www.ifc.org/addressinggbvh)

[5] Resource and Support Hub (June 2021) Understanding SEAH and GBV (available at https://safeguardingsupporthub.org/sites/default/files/2021-06/RSH_BiteSize_Understanding%20SEAH%20and%20GBV_final.pdf)
[6] Open Society Foundations, Understanding Sex Work in an Open Society, April 2019 (available at: https://www.opensocietyfoundations.org/explainers/understanding-sex-work-open-society)
[7] Strive, London School of Hygiene and Tropical Medicine (2023) Transactional Sex and HIV (available at: http://strive.lshtm.ac.uk/drivers/transactional-sex)