



# Sexual exploitation, abuse and sexual harassment (SEAH) and gender-based violence (GBV) in private sector development programmes

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# Acronyms

DFID	Department for International Development
FCDO	Foreign, Commonwealth and Development Office
GBV	Gender-based Violence
GRM	Grievance Redress Mechanism
IFC	International Finance Corporation
ILO	International Labour Organisation
KPI	Key Performance Indicator
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organisation
PSD	Private Sector Development
RSH	Resource and Support Hub
SEAH	Sexual Exploitation, Abuse and Sexual Harassment
SSQ	Standard Selection Questionnaire
ToR	Terms of Reference

# Executive Summary

The Resource and Support Hub (RSH) has been asked by the Foreign, Commonwealth and Development Office (FCDO) to develop an easy-to-read guidance note for Sexual Exploitation, Abuse and Sexual Harassment (SEAH) and Gender-Based Violence (GBV) within Private Sector Development (PSD) programmes. This brief should be used to assist FCDO programme advisors and managers implement FCDO risk management guidelines.

SEAH and GBV are closely related. In this guidance note, the term SEAH is used to refer to sexual exploitation and abuse and sexual harassment that are perpetrated by individuals involved in delivering FCDO programmes (staff, contractors, volunteers etc). GBV is violence targeted at individuals because of socially ascribed gender differences. GBV is always perpetrated because of gender inequality whereas SEAH can also be driven by other forms of abuse of power and inequalities (racial, age, social status etc or a combination of these etc). There is both a strong ethical argument and a compelling business case for companies and investors to tackle SEAH and GBV.

All PSD programmes must comply with FCDO's standards to address SEAH as set out in the enhanced due diligence requirements. Where appropriate, PSD programmes should also aim to the fullest extent possible to comply with the [International Labour Organisation \(ILO\) Convention 190 to prevent and respond to GBV](#), despite the convention not yet being ratified by the United Kingdom, and the [International Finance Corporation \(IFC\) Performance Standards](#).

The following table outlines key SEAH and GBV risks in PSD programmes at each programme stage, together with possible mitigation strategies:

Programme stage risks	Mitigation strategies
<b>DESIGN</b>	
<b>Risk 1:</b> Perpetration of SEAH or GBV in community consultations with government staff, civil society actors and community members.	Enhanced Due Diligence is conducted on all partners delivering programmes which will ensure that they are aware of requirements in FCDO Supply Partner Code of Conduct. Ensure implementing partners conduct thorough vetting/reference checks on staff/consultants. Adequate proportion of women and staff representing marginalised groups are involved in conducting community consultation and sensitisation with community members on SEAH-related policies, expected standards of behaviour, rights to safety and to raise concerns. In addition, GBV services and networks are to be mapped out.
<b>Risk 2:</b> Desk-based research does not sufficiently consider positive and negative impacts of the potential programme on the community, including GBV impacts.	Policy and contextual review and high-level assessment of programme risks, and identification of project additionalities such as women-only carriages in a public transport project to reduce GBV. Start building the baseline data / knowledge of local SEAH issues and gender dynamics to establish a strong understanding of the local context. Also, to undertake a high-level assessment of the potential environmental and social contributions and risks the project would have,

	including a review of potential SEAH risks - e.g. via a high-level gender and inclusion assessment.
<b>Risk 3:</b> Full scope of GBV and SEAH risks are not properly considered or picked up in Feasibility studies	Gender and inclusion expertise in the team. Mitigation plan developed and incorporated into programme budget and design. Individuals representing vulnerable groups involved in identifying risks.
<b>Risk 4:</b> Concept Note and Business Case do not sufficiently and explicitly consider SEAH risks, therefore the programme is not set up in a way to adequately prevent and respond to SEAH	SEAH risks in Concept Note and Business Case, including in the governance structure, with information about management, prevention, and response to risks. PSD advisers ensure they have good understanding of safeguarding risk (e.g. through safeguarding modules on Aid Learning Platform, engaging with Safeguarding Volunteers Network).
<b>Risk 5:</b> Tendering contractors, consultants and downstream partners do not have adequate ability to identify and mitigate SEAH and GBV risks across programme delivery, management, and monitoring	Ensure compliance with FCDO Supply Partner Handbook. Procurement documentation includes reference to SEAH risks and requires delivery team to have understanding of, and expertise in managing, SEAH risks. Key Performance Indicators (KPIs) linked to gender equality and reporting of disaggregated data by gender and other key characteristics such as age, disability status, sex, race, religion, ethnic minority status and other groups as needed.
<b>Risk 6:</b> Supporting SEAH and GBV survivors is not given adequate thought during design phase	Conduct initial mapping of reliable support services (e.g. financial, legal, psychological, medical, and includes child protection support) in the project location to which any survivors of SEAH and GBV can be referred if cases do occur during the course of the programme; this should be kept up-to-date throughout the life of the programme.
<b>MOBILISATION</b>	
<b>Risk 7:</b> Implementing partners are selected that do not have a strong will and strategies to address SEAH and GBV	FCDO to approve and prioritise partners whose activities and vision suggest that they are genuinely interested in addressing SEAH and GBV. Capacity and resource assessments, with a plan to increase these if needed. Implementing partners are to share FCDO standards on SEAH such as clauses in contracts on SEAH policies and reporting and the lead implementing partner to conduct thorough due diligence on downstream partners, including regular checks related to SEAH and GBV.
<b>Risk 8:</b> Weak and/or unclear SEAH and GBV policies and complaints procedures during mobilisation disempowers survivors, bystanders, and whistle-blowers to report incidents of SEAH and GBV	Workplace policy on violence and harassment including SEAH, which includes clear instructions on how/when to report incidents, and offers support to domestic violence survivors. Employees participated in the design of policy. Signed codes of conduct and survivor-centred Grievance Redress Mechanism which prioritises survivor wellbeing and safety, and ensures survivors receive the support they need such as through referral to reliable and relevant services. All workers trained on how to deal with SEAH and GBV incidents or concerns.

	Policies and codes of conduct communicated internally and externally (e.g. to downstream partners).
<b>Risk 9:</b> A lack of context-specific understanding of SEAH and GBV risks results in a lack of tailored measures to address, monitor and adapt to those risks, increasing the likelihood of incidents occurring.	Basic assessment of risks from implementing partner, which includes SEAH and GBV. SEAH and GBV risks in supply chains to be mapped and mitigation and monitoring strategies agreed upon. Implementing partners to explore partnerships to increase influence and address risks in supply chain. Individuals representing vulnerable groups involved in identifying risks.
<b>Risk 10:</b> Recruitment and performance assessment procedures result in SEAH and GBV risks (e.g. if these are not robust or unfair/opaque).	Conduct enhanced due diligence on delivery partners, ensuring they have strong institutional safeguards in place for workers during the application process, interview, vetting/reference checks, contracting, inductions and performance assessments.
<b>Risk 11:</b> Companies that FCDO invests in through PSD programmes consider that their suppliers and the local community are outside their sphere of influence, which increases the risk of SEAH and GBV to those affected by the programme	Work with direct partners so they understand accountability for SEAH and GBV issues in supply/delivery chain and community. Creation of sector-wide networks to agree on joint principles, policies and actions across supply chains and facilitate peer-to-peer learning. Dialogue between employers and unions. Companies can also influence social norms and behaviours of GBV.
<b>IMPLEMENTATION AND M&amp;E</b>	
<b>Risk 12:</b> Weak commitment of company leadership (the companies FCDO projects invest in) towards gender equality and promoting workplaces free of violence can result in increased SEAH and GBV incidents, increased severity of those incidents, and incidents or concerns remaining unreported.	Ensure selection criteria for companies to invest in includes consideration of gender equality, human rights and commitment to preventing and responding to SEAH and GBV. Provision of evidence to company senior management of the risks to the business from SEAH and GBV, and evidence of the positive impact of interventions to address these risks. Organisational culture to be built through recognising workers who make efforts to address SEAH and GBV, establishing a top-tier focal point and tracking progress over time. Sufficient flexibility in programmes is needed and SEAH and GBV prevention messages are to be communicated to staff, partners and beneficiaries through multiple channels. KPIs linked to gender equality and preventing/responding to SEAH and GBV built into agreements with businesses.
<b>Risk 13:</b> Companies that FCDO invests in have insufficient capacity, resources, systems, or organisations to address SEAH and GBV	Technical assistance integrated into programme design. Implementing partner conducts capacity, safety, and resource assessments related to preventing and responding to SEAH and GBV, and measures put in place to address gaps. Trained investigators to conduct investigations only.
<b>Risk 14:</b> FCDO, implementing partners, as well as companies FCDO invest in do not report SEAH incidents/concerns to FCDO in a timely way	Regularly communicate to partners the requirement to report any SEAH incidents/concerns to FCDO's Reporting Concerns hotline, which is detailed in funding agreements (using opportunities such as monitoring meetings, field visits, etc to reiterate this). Ensure

	<p>partners communicate to downstream partners and companies they invest in the requirement to report issues. Regularly review GRM/complaints mechanisms (particularly if uptake/reporting is low) to ensure they are fit for purpose and accessible to those who may need them. Ensure businesses FCDO invest in through its programmes communicate to staff on their rights and ways to report SEAH and GBV. Data, disaggregated by gender and other key characteristics, such as age, disability status, sex, race, religion, ethnic minority status and other groups as needed, is to be reported in annual reports to FCDO and progress tracked over time.</p>
<p><b>Risk 15:</b> Inappropriate response to reports of SEAH and GBV issues/incidents undermines efforts to address issue and may cause further harm</p>	<p>Survivor-centred case management (prioritising survivor and/or whistle-blower wellbeing and safety), led by trained individuals who have no conflicts of interest or bias. Support provided to the survivor, which is continuously monitored during and after the investigation. Additional expertise drawn in as necessary. Lessons drawn from the case after conclusion of investigation.</p>
<p><b>Risk 16:</b> Goods and services delivered by companies FCDO invests in are marketed using gender stereotypes or references to physical or sexual violence which trivialises, normalises, and legitimises these acts. Goods can also be used to exercise violence such as GPS tracking devices for mobile phones that are used by stalkers or some video games that centre on male characters that repress women.</p>	<p>Safeguarding/gender specialists within companies to review marketing material. Raising awareness among leadership of the potential of consumer boycotts because of degrading content.</p>
<p><b>PROJECT COMPLETION</b></p>	
<p><b>Risk 17:</b> Programme inadvertently contributes to GBV to exclusion and/or inequality of certain social groups</p>	<p>Wider risk environment to GBV (e.g. gender dynamics in-country, where – for instance - increase women’s economic empowerment may lead to higher risk of domestic violence) is properly addressed in earlier risk assessments, and mitigation measures implemented throughout the project. Monitoring of GBV and SEAH is included in any future evaluation. Check-in on progress of project after end of FCDO funding through donor groups, Non-Governmental Organisations (NGOs) and country office staff.</p>
<p><b>Risk 18:</b> SEAH and GBV considerations are not built into ongoing plans and operations, and those responsible for those operations are not explicitly</p>	<p>Ensure future operations meet required standards of FCDO such as via Memorandums of Understanding. GRM is in place, codes of conduct are signed, and monitoring plans incorporate SEAH and GBV. Sustainability of safeguarding measures (e.g. GRM/referral mechanisms) to be carefully considered,</p>

required to continue implementation of measures	both at outset and during final year/at completion of FCDO programme (e.g. through technical assistance/signed agreements with organisations responsible for long-term delivery/maintenance, etc).
<b>Risk 19:</b> Status and performance of SEAH and GBV measures over the programme life are not reviewed at project completion, so future FCDO programmes do not learn and integrate lessons on what does/does not work	Project completion review process should include documentation of lessons learned and how SEAH and GBV cases were handled, which should be shared with others. Suggest ways to the partner about how SEAH and GBV measures can be improved, so as to build their capacity.
<b>Risk 20:</b> SEAH incidents or concerns associated with the programme remain unreported at the time of programme closure	Any outstanding SEAH concerns/incidents that have not been reported to FCDO's Safeguarding Investigations Team should be reported immediately to the Reporting Concerns hotline.

There are several annexes. Annex 1 is a checklist for identifying SEAH and GBV in PSD programmes which draws on the information provided in the table above, Annex 2 provides common risks found in agriculture, garments and infrastructure sector programmes and Annex 3 provides a list of further resources.

## Introduction

The Resource and Support Hub (RSH) has been asked by the Foreign, Commonwealth and Development Department (FCDO) to develop an easy-to-read guidance note for Sexual Exploitation, Abuse and Sexual Harassment (SEAH) and Gender-Based Violence (GBV) within Private Sector Development (PSD) programmes. Key questions to answer include:

1. What are the links between GBV and SEAH?
2. What are the specific risk points for SEAH and GBV through the programme cycle for PSD programmes? This should take into consideration gender and inclusion factors (disability, ethnic identity, religious identity, age, socio-economic factors) as well as the diversity of FCDO's PSD portfolio (for example working with Multi-national Corporations and financial delivery programmes).
3. How can PSD staff work with partners to prevent, mitigate, and respond to these risks throughout the programme cycle?

**This brief should be used to assist PSD programme advisors and managers implement FCDO risk management guidelines and FCD) Enhanced Due Diligence for Safeguarding (DFID 2020).** Safeguarding is one of six categories of risk in these guidelines which define the different levels of risk likelihood (from rare to almost certain) and different levels of risk impact (from insignificant to severe).<sup>1</sup> This brief provides typical risk and mitigation strategies for PSD programmes, but risks and mitigation strategies will vary on a programme by programme basis.

**There is both a strong ethical argument and a compelling business case for investors and for companies that FCDO invests in to tackle SEAH and GBV.** Estimates range from half to 71% of working women experiencing some form of sexual harassment in the workplace and one model estimated that the costs of sexual harassment exceed USD 6 million per Fortune 500 company

<sup>1</sup> The other categories are context, delivery, operational, fiduciary, and reputational.



([ICRW 2018](#)). By preventing GBV and SEAH and responding appropriately to reports, companies and investors can:

- Reduce the negative impact of GBV and SEAH on individuals and avoid the risk of costly litigation and pay-outs.
- Improve relations with local communities and 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 through increasing worker morale which heightens productivity.
- Reduce absenteeism and improve workers' concentration and performance at work, which increases profits.
- Improved ability to recruit and retain diverse talent.

This paper is structured as follows. As a backdrop to this query, Chapter 1 outlines the different meanings of SEAH and GBV and the international and FCDO-specific standards that have been developed to respond to SEAH and GBV in the workplace. Chapter 2 lists the SEAH and GBV risk points and corresponding mitigation strategies for PSD programmes, which are structured around the programme cycle stages. The query contains several annexes. Annex 1 is a checklist for identifying SEAH and GBV in PSD programmes, Annex 2 are common risks found in agriculture, garments and infrastructure sector programmes and Annex 3 provides a list of further resources. Due to the nascent nature of the evidence, this paper draws heavily on a limited number of documents, principally [Business Fights Poverty \(2019\)](#), [BSR \(2020\)](#), [EBRD et al. \(2020\)](#), [ICED \(2019\)](#) and Rizvi and Downs (2020).

## 1. What is SEAH and GBV?

GBV and SEAH are closely related. In this guidance note, the term **SEAH is used to refer to sexual exploitation and abuse and sexual harassment that is perpetrated by individuals involved in delivering Foreign, Commonwealth and Development Office (FCDO) programmes** (staff, contractors, volunteers etc). The term is not used to describe sexual violence that may take place in a community which is unrelated to a PSD programme (for example a young woman being raped in a community by another community member).

**GBV is violence targeted at individuals because of socially ascribed gender differences and includes physical, sexual, emotional, and economic violence.** The term GBV is used to describe violence perpetrated by anyone including staff, contractors, and community members. It therefore also encompasses forms such as intimate partner violence experienced by or perpetrated by workers, physical violence perpetrated by a community member towards a worker based on his or her gender identify etc.

**Gender inequality is a main driver of both SEAH and GBV and the basic principles and approaches to address SEAH and GBV are therefore very similar.** This must include tackling the same root causes and forms of harm, i.e. gender- and other forms of inequalities based on factors such as race, gender identity, age, social status, disability etc. However, one crucial difference between GBV and SEAH is that while GBV is always perpetrated as a result of gender inequality, SEAH can also be driven by other forms of abuses of power and inequalities (racial, age, social status etc or a combination of these etc). A list of definitions is provided in Box 1.

*Box 1: Key definitions*

**SEAH:** Sexual Exploitation, Abuse and Sexual Harassment (defined separately below):

**Sexual Exploitation:** ‘Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another’. This includes transactional sex, solicitation of transactional sex and exploitative relationship (UN, 2017).

**Sexual Abuse:** ‘The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape.’ All sexual activity with someone under the age of 18 is considered sexual abuse (DFID, 2019).

**Sexual Harassment:** ‘A continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating’ (UN, 2018).

NOTE: FCDO’s focus is on where SEAH has been perpetrated by individuals involved in aid delivery (as staff, contractors, suppliers etc) or where SEAH has resulted from poor design or implementation of a programme.

**GBV:** Gender-based violence: ‘An umbrella term for any harmful act that is perpetrated against a person’s will, and that is based on socially ascribed gender differences between males and females’ (HMG, 2018). GBV can be perpetrated by staff, contractors, and community members.

**VAWG:** Violence Against Women and Girls: ‘Any act of gender-based violence that results in, or is likely to result in, physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life’ (Taylor, 2015). This is the term primarily used by FCDO to reflect that the majority of GBV survivors are women and girls.

**Intersectionality:** Is used to understand a person’s ‘experiences at the intersection of a number of simultaneous oppressions including [but not limited to] race, class, caste, gender, ethnicity, sexuality, disability, nationality, immigration status, geographical location, religion and so on’ (Imkaan, 2019). For example, evidence shows that lesbian women are at higher risk of experiencing GBV and SEAH due to both their gender and their sexuality (Lee and Ahlenback, 2020).

GBV and SEAH is more likely to affect those individuals who experience discrimination based on several of these intersectional inequalities. While women and girls are at disproportionate risk of both GBV and SEAH, differences in power due to factors such as age, disability status and minority status increase GBV and SEAH risks and discourage people from reporting experiences. For example, while data is still patchy, numerous small studies have shown that both women and men with disabilities face disproportionate amounts of sexual violence compared to non-disabled individuals. Women and girls with disabilities and those with more severe or complex disabilities are even more likely to experience GBV and sexual violence (Lee and Ahlenback, 2020; Mitra et al, 2011). Lesbian, gay, bisexual, transgender, queer and intersex (LGBTQI) people are also known to be at higher risk of GBV and SEAH (Lee and Ahlenback, 2020).

However, there is a lack of evidence on GBV and SEAH and intersectionality in low- and middle-income countries, including the risks that women with different intersecting identities face. There is also limited evidence of programmatic approaches to tackle violence against some of the most marginalised groups of women and girls (Fraser et al. 2018).

***In the last few years, several international and FCDO specific standards have been developed to respond to SEAH and GBV in the workplace. Standards for SEAH and GBV have been developed separately with the key standards set out in***

Box 2. All PSD programmes must comply with FCDO’s standards to address SEAH as set out in the enhanced due diligence and the commitment made in the Risk Management Guidelines. Where appropriate, PSD programmes should also aim to the fullest extent possible to comply with the International Labour Organisation (ILO) Convention 190 to prevent and respond to GBV, despite the convention not yet being ratified by the United Kingdom and the International Finance Corporation (IFC) Performance Standards.

*Box 2: Key SEAH and GBV standards*

**ILO Convention 190 and recommendation 206:** The only binding international instruments on violence and harassment, including both GBV and SEAH in the world of work globally. The Convention protects all current and former employees and applies to all sectors, including both the formal and informal economy. While the convention has not yet been ratified by the UK, FCDO staff should be aiming to implement the commitments anyway.

**IFC Performance standards:** Provides two entry points for addressing GBV in programmes, namely Standard 2, paragraph 15 which specifically states that clients will take ‘measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women’ and Standard 4, paragraph 1 which requires clients to ‘minimize the risks and impacts to community health, safety’.

**OECD DAC Recommendation on Ending SEAH in Development Co-operation and Humanitarian Assistance:** First international standard for governments to apply to national aid agencies when working with organisations implementing development programmes. Sets out six key areas that need to be addressed to prevent and respond to SEAH.

**FCDO’s enhanced due diligence:** Is applicable to all companies/investors involved in implementing FCDO-funded PSD programmes. This also includes downstream partners, contractors and suppliers.

## 2. SEAH and GBV risk points and mitigation strategies in PSD programmes

This section provides typical SEAH and GBV risks in PSD programmes. Even though there are SEAH and GBV risks in every FCDO PSD programme, the impact and likelihood of each risk will vary depending on the country of operation and implementing partner/company that FCDO invests in. For each risk, there needs to be a corresponding likelihood of being realised and impact if the risk is realised (see FCDO Risk Management Guidelines for the different risk categories).

### Design

**Risk 1: Perpetration of SEAH and GBV in community consultations with government staff, civil society actors and community members.**

- **Minimum standard:** FCDO ensures that organisations delivering programmes undergo the FCDO enhanced due diligence checks (see [FCDO 2020](#)), follow security procedures, have been briefed on, understood and signed Codes of Conduct and there are thorough vetting/reference checks on staff/consultants. Should FCDO staff be carrying out consultations then they need to follow internal security procedures. An adequate proportion of female staff, and staff representing marginalised groups, needs to be involved in community consultations. Sensitizing partners and community members on SEAH-related policies, expected standards of behaviour, their rights to safety, protection and to raise concerns.

**Risk 2: Desk-based research does not sufficiently consider positive and negative impacts of the potential programme on the community, including SEAH and GBV impacts.**

- **Minimum standard:** FCDO is to undertake a policy and contextual review and a high-level assessment of the potential programme contributions and risks, including for SEAH and GBV. Start building the baseline data / knowledge of local SEAH issues and gender dynamics to establish a strong understanding of the local context. Also, to undertake a high-level assessment of the potential environmental and social contributions and risks the project would have, including a review of potential SEAH risks - e.g. via a high-level gender and inclusion assessment.
- **Higher standard:** Drawing on in-house and external expertise, to identify potential opportunities for project additionality such as women-only carriages in a public transport project to reduce GBV.

**Risk 3: Full scope of SEAH and GBV risks are not properly considered or picked up in Feasibility studies**

**Minimum standard:** Terms of Reference (ToR) for feasibility studies should explicitly require gender and inclusion expertise as part of the team and reporting on assessing SEAH and GBV risks. Where risks are identified, an assessment of those risks should be carried out by those with appropriate expertise, and a mitigation plan developed which is then incorporated into programme budget and design. Groups that represent women, children, indigenous people, and people with disabilities should assist in identifying risks. Table 1 outlines how risks tend to be higher in certain country contexts and within certain features of a programme.

*Table 1: SEAH and GBV risk factors*

<u>Country context risks</u>	<u>Programme-related risks</u>
<ul style="list-style-type: none"> <li>• Gender inequality is high and gender stereotypes are strong and widespread.</li> <li>• Intimate partner violence is prevalent.</li> <li>• National legislation on GBV is weak.</li> <li>• Poverty and discrimination are high, increasing people's vulnerability to exploitation.</li> <li>• Corruption among local authorities is widespread and in contexts that are fragile, and conflict affected.</li> </ul>	<ul style="list-style-type: none"> <li>• A large new workforce and/or an influx of male workers is required and/or where temporary, informal, and/or migrant workers are needed.</li> <li>• There are seasonal deadlines, with heavy fluctuations in workload.</li> <li>• Transportation of goods over long distances and overnight is required.</li> <li>• Community engagement in greenfield projects is needed.</li> <li>• Services are provided, especially luxury services or highly sought-after basic services</li> <li>• Security personnel are used, especially where they are armed.</li> <li>• Worksites are in remote locations, requiring long and/or isolated journeys to and from work.</li> <li>• Industries dominated by men, particularly those where men concentrate in the highest job ranks and occupations in businesses.</li> </ul>

Country context risks	Programme-related risks
	<ul style="list-style-type: none"> <li>• Rapid changes in gender/social norms that are not understood or bought into by holders of power.</li> </ul>

Source: [ICRW \(2018\)](#) and [EBRD et al. \(2020\)](#)

**Risk 4: Concept Note and Business Case do not sufficiently and explicitly consider SEAH risks, therefore the programme is not set up in a way to adequately prevent and respond to SEAH**

- **Minimum standard:** SEAH risks and mitigation measures should be contained within a Concept Note submitted for ministerial approval. SEAH is also to be integrated throughout the Business Case, including in programme governance, management, and delivery. This would include an approach for how the programme will manage risks and prevent and respond to SEAH, including in the budget.
- **Higher standard:** A working group should be established within the governance structure comprising senior company staff, a senior SEAH and GBV champion and ideally representation of survivors and related GBV services, to identify and manage risks. PSD advisers are to ensure that they have a solid understanding of safeguarding risk such as through mandatory safeguarding training and optional modules under programme cycle training on Aid Learning Platform. They are also to engage with Safeguarding leads who are the members of the Safeguarding Volunteer Network in their team/country office.

**Risk 5: Tendering contractors, consultants and downstream partners do not have adequate ability to identify and mitigate SEAH and GBV risks across programme delivery, management and monitoring**

- **Minimum standard:** Ensure direct partners comply with the FCDO Supply Partner Handbook ([FCDO 2020](#)) and enhanced due diligence requirements and that they are aware of their responsibility in requiring the same standards from their downstream partners. Ensure procurement documentation includes specific requirements for preventing, managing, mitigating, and responding to SEAH and GBV risks. Tender documents should include the capacity and skills of the delivery team in SEAH and GBV, management arrangements and adequate budgets for survivor-centred prevention and response activities. The indicative reporting structure should set out key activities and requirements relating to SEAH and GBV prevention.
- **Higher standard:** Ensure Key Performance Indicators (KPIs) linked to gender equality for implementing partners to encourage monitoring. ToR and Standard Selection Questionnaires (SSQ) for implementing partners should stipulate protection of vulnerable populations, insist on the reporting of disaggregated data by gender and other key characteristics, such as age, disability status, sex, race, religion, ethnic minority status and other groups as needed. Where children or vulnerable people participate in or will be greatly affected by the project, the need for specific expertise in this area should be included in the ToR. There should be an explicit reference to requirements for expertise on GBV and SEAH prevention and response across the full procurement cycle.

**Risk 6: Supporting survivors of SEAH and GBV is not given adequate thought during the design phase**

- **Minimum standard:** Conduct initial mapping of reliable support services (e.g. financial, legal, psychological, medical and includes child protection support) in the project location to which any survivors can be referred if cases do occur during the course of the

programme; this should be kept up-to-date throughout the life of the programme. Information on local gender and inclusion/GBV issues is also to be sought.

## Mobilisation

### Risk 7: Implementing partners are selected that do not have a strong will and strategies to address SEAH and GBV

- **Minimum standard:** FCDO is to approve and prioritise partners whose activities and vision suggest that they are genuinely interested in addressing SEAH and GBV. SEAH and GBV risks are to be adequately identified as part of a programme Theory of Change. The lead implementing partner is to conduct due diligence on downstream partners, including regular checks related to SEAH and GBV. This could include assessments of capacity and resources to prevent and respond to GBV, and the lead implementing partner is to establish a plan with the downstream partner to increase these if needed.
- **Higher standard:** During procurement processes, implementing partners can require bid documents from their partners that include information about GBV risks and expectations, and for evaluation criteria to reflect SEAH requirements, which can be submitted to FCDO if needed. During contract selection and negotiation, there are clauses in contracts committing implementing partners to adhere to SEAH policies and reporting requirements.

### Risk 8: Weak and/or unclear SEAH and GBV policies and complaints procedures during mobilisation disempowers survivors, bystanders, and whistle-blowers to report incidents of SEAH and GBV and SEH

- **Minimum standard:** Evidence of a workplace policy on violence and harassment (ILO Convention 190, Article 9a) either as a specific GBV and SEAH policy or as part of a wider set of company policies. This policy would have involved consultants with employees and those on other types of contracts. Policy is also to include information on the support available to survivors of domestic violence and provides clear instructions on how/when to report incidents (ILO Convention 190, Article 9e). A code of conduct that provides a set of standards of acceptable conduct and behaviour is also needed.<sup>2</sup> Policies and codes of conduct are to be signed by all workers. A survivor-centred Grievance-Redress Mechanism (GRM) is to detail information about a variety of safe and confidential spaces for employees and bystanders to have access to information and support, to raise concerns and make complaints that assures confidentiality and protection (ILO Convention 190, Article 9e). Cases are to be recorded, investigated/acted upon by a trained individual, follow-up support provided and monitored.
- **Higher standard:** Partners are to have a specific GBV and SEAH policy *and* ensure this policy and associated measures are integrated into wider company policies. Managers are supported to provide practical advice and, in recognition of the FCDO safeguarding principle that everyone has responsibility for safeguarding, all workers receive training on how to handle a GBV and/or SEAH incident/concerns. Policies and codes of conduct are regularly communicated to those inside and outside of the organisation (e.g. to downstream partners), and action taken to ensure they are implemented. Employees, and possibly unions or staff representatives, participated in the design, implementation, and monitoring of the policy.

<sup>2</sup> In the future DFID's Supply Partner Code of Conduct (the Code) will be required to be adopted by all implementing partners ([DFID 2020](#)).

**Risk 9: A lack of context-specific understanding of SEAH and GBV risks results in a lack of tailored measures to address, monitor and adapt to those risks, increasing the likelihood of incidents occurring.**

- **Minimum standard:** Basic assessment of risks, including for those on SEAH and GBV, to be conducted by the implementing partner within a risk management framework (ILO Convention 190, Article 9c). A risk register will include clear mitigating actions and identifiable owners and is to be reviewed regularly in a monitoring strategy. Risk assessments are to consider the unique situation of those that are most exposed to risk e.g. interns, homeworkers, informal workers, migrants, or for any vulnerable groups for which the programme will be into contact with, and is to include domestic violence (ILO Convention 190, Recommendation 206d). Depending on the context, people with disabilities, people from religious/ethnic minority groups, children, elderly, and those from lower socio-economic groups may be more vulnerable. There should be clarity for escalation of risks. The expectations of risk management for downstream partners should be made explicit ([FCDO 2020](#)). Individuals representing vulnerable groups are to be involved in identifying risks.
- **Higher standard:** For companies that FCDO invests in to map where SEAH and GBV risks are highest in their supply chains and to agree with implementing partners' ways to mitigate these. A company will have greater influence over its first-tier or core implementing partners than others. Implementing partners are to work with companies that FCDO invests in to explore possibilities to form partnerships with others to increase influence and address risks in the supply chain.

**Risk 10: Recruitment and performance assessment procedures result in SEAH and GBV risks (e.g. if these are not robust or unfair/opaque)**

It is important for implementing partners to conduct enhanced due diligence on downstream partners, ensuring that they have strong institutional safeguards in place for workers during the application process, interview, vetting/reference checks, contracting, inductions and performance assessments (see Table 2).

Table 2: Integration of SEAH and GBV prevention into recruitment and performance assessments

Risk Factor	Minimum standard	Higher standard
Application process	<ul style="list-style-type: none"> <li>• Include a clear SEAH and GBV statement in job adverts</li> <li>• Provide a confidential self-disclosure form for any previous investigations, disciplinary procedures, or convictions.</li> </ul>	<ul style="list-style-type: none"> <li>• Investigate if third-party recruitment agencies are consciously or unconsciously engaging in SEAH and GBV or enabling behaviour.</li> <li>• Mention that the role requires a criminal records check if relevant.</li> </ul>
Interview	<ul style="list-style-type: none"> <li>• Establish written recruitment procedures.</li> <li>• Gender-balanced interview panel.</li> </ul>	<ul style="list-style-type: none"> <li>• Make candidates aware of expected behaviour from interviewers.</li> <li>• Ask questions to candidates on workplace behaviour.</li> </ul>
Vetting checks	<ul style="list-style-type: none"> <li>• Request at least 2 references.</li> <li>• Check a candidate's identity.</li> <li>• Follow-up on any concerns.</li> <li>• Additional vetting for high-risk roles.</li> </ul>	<ul style="list-style-type: none"> <li>• Perform criminal records check, where appropriate/available.</li> <li>• Reference checks ask specific questions re conduct</li> <li>• Contact referees directly</li> </ul>

Risk Factor	Minimum standard	Higher standard
Contracting	<ul style="list-style-type: none"> <li>Provide written contracts for all workers.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure contracts clearly state disciplinary action in cases of SEAH and GBV.</li> <li>Support to survivors integrated into employee benefit scheme.</li> </ul>
Inductions	<ul style="list-style-type: none"> <li>Induction training on GBV and SEAH policies, codes of conduct and GRM. This training is to be refreshed regularly (see <a href="#">FCDO 2020</a>).</li> <li>Signed and read codes of conduct</li> </ul>	<ul style="list-style-type: none"> <li>Short probation or trial periods (of 3-6 months).</li> </ul>
Performance assessments	<ul style="list-style-type: none"> <li>Hold exit interviews.</li> <li>Use objective and transparent metrics to determine bonuses.</li> <li>Build SEAH and GBV into performance appraisal schemes</li> </ul>	<ul style="list-style-type: none"> <li>Use praise or the company award/reward systems to recognise positive behaviour in addressing SEAH and GBV.</li> <li>Mention the responsibility for staff tasked with addressing SEAH and GBV in their scope of work, annual objectives, and appraisals.</li> </ul>

Source: Adapted from [Council of Europe \(2016\)](#), [EBRD \(2020\)](#)

**Risk 11: Companies that FCDO invests in through PSD programmes consider that their suppliers and the local community is outside their sphere of influence, which increases the risk of SEAH and GBV of those affected by the programme**

- **Minimum standard:** Work with direct implementing partners so they understand that they are accountable for SEAH and GBV issues in their supply/delivery chain and in the community, according to FCDO Enhanced Due Diligence and IFC performance standard 4 (Rizvi and Downs 2020). Work with contractors and implementing partners to address SEAH and GBV through procurement processes, contract selection and negotiation. Create sector-wide networks to agree on joint principles, policies and actions across supply chains and facilitate peer-to-peer learning.
- **Higher standard:** initiating dialogue between employers and trade unions at different levels. Global Framework Agreements between global unions and multinational corporations can be drawn up to cover a company's operations in several countries across their supply chains. Companies that FCDO invests in also can influence societal norms and behaviours on SEAH and GBV, particularly when the issues are aligned with their core business. This can include community engagement as an opportunity to tackle GBV in the community, developing new products or services to address GBV, running advertising and marketing campaigns, and campaigning and fundraising for GBV services.

## Implementation and M&E

**Risk 12: Weak commitment of company leadership (the companies FCDO projects invest in) towards gender equality and promoting workplaces free of violence can result in increased SEAH and GBV incidents, increased severity of those incidents and incidents or concerns remaining unreported.**



- **Minimum standard:** Ensure selection criteria for companies to invest in includes consideration of gender equality, human rights and commitment to preventing and responding to SEAH and GBV. To increase their understanding and ‘buy-in’, the implementing partner is to present compelling evidence to senior management of the risks of SEAH and GBV to businesses and the positive impacts of interventions to address these risks. Organisational culture to be built by recognising workers who make efforts to address SEAH and GBV, establishing a top-tier focal point and tracking progress over time. There needs to be sufficient flexibility in programmes to change plans and adapt to constraints. Clear and consistent messages about SEAH and GBV are communicated to staff, partners and beneficiaries through multiple channels. KPIs linked to gender equality and preventing/responding to SEAH and GBV built into agreements with businesses.
- **Higher standard:** Increased diversity of representation on Boards and at Senior Management levels, provision of SEAH training and ending the use of Non-Disclosure Agreements for sexual harassment cases at work. Evidence for integration of gender equality into the core business such as new products and services for women or broadening definitions of masculinity through marketing. Also, to become Economic Dividends for Gender Equality certified which is the leading global assessment methodology and business certification standard for gender equality. Some SEAH-related activities may benefit from partnerships such as with Non-Governmental Organisations (NGOs) and trade unions ([Council of Europe 2016](#)). Sharing of learning with others at national, sectoral, or industrial levels.

**Risk 13: Companies that FCDO invests in and implementing partners have insufficient capacity, resources, systems, or organisations to address SEAH and GBV**

- **Minimum standard:** Technical assistance is to be integrated into programme design. Implementing partners are to conduct capacity, safety, and resource assessments of preventing and responding to SEAH and GBV, guaranteeing that these are included in ongoing internal processes (ILO Convention 190, Article 9b). Measures should be put in place to address the gaps, ensuring that initiatives are tailored to the participants and the workplace, sector and country context in which they are based (Rizvi and Downs 2020). Partners should be encouraged to draw on GBV, child-protection and legal expertise as needed.
- **Higher standard:** Companies that FCDO invests in are to make informal efforts with implementing partners to raise awareness and share information. A GBV expert is to conduct in-depth assessment of SEAH risks where companies and/or investors identify high levels of SEAH risk. Investors are to work with companies to agree what does and does not need to be escalated to them in terms of incident reporting. 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 GBV.

**Risk 14: FCDO, implementing partners, as well as companies FCDO invest in do not report SEAH incidents/concerns to FCDO in a timely way.**

- **Minimum standard:** Regularly communicate to partners the requirement to report any SEAH incidents/concerns to FCDO’s Reporting Concerns hotline, which is detailed in funding agreements (using opportunities such as monitoring meetings, field visits, etc to reiterate this). Ensure partners communicate to downstream partners and companies they invest in the requirement to report issues. Regularly review GRM/complaints mechanisms (particularly if uptake/reporting is low) to ensure they are fit for purpose and accessible to those who may need them. Ensure businesses FCDO invest in through its programmes communicate to staff on their rights and ways to report GBV and SEAH. Data, disaggregated by gender and other key characteristics, such as age, disability status, sex, race, religion, ethnic minority status

and other groups as needed, should be reported in annual reports to FCDO and progress tracked over time. Care needs to be taken that individuals cannot be identified from any data reported.

- **Higher standard:** Feedback mechanisms are in place for workers to share ideas of what is and is not working. M&E processes are developed in partnership with universities and experts who demonstrate knowledge of GBV. Advocating the creation or strengthening of national legislation where existing laws do not meet international standards. GBV questions are to be integrated into existing surveys with workers, community members and service users.

**Risk 15: Inappropriate response to reports of SEAH and GBV issues/incidents undermines efforts to address issue and may cause further harm**

- **Minimum standard:** individuals that receive and assess reports, instigate and oversee investigations and decision making on outcomes as well as survivor, witness and whistle-blower support have all been trained, have no conflicts of interest or bias and are operating in survivor-centred ways (prioritising survivor and/or whistle-blower well-being and safety). Responses and remedial action are guided by the severity of the reported behaviour, its impact, the wishes of the survivor, national employment law and company/implementing partner disciplinary procedures. Support can be financial, legal, psychological, medical, and includes child protection support and measures to reintegrate into workforce. Support and safety needs are continuously monitored, and during and after an investigation the survivor is updated of progress. The response is to draw on additional SEAH and GBV, child protection and legal expertise as needed. This is particularly true if reporting an incident to the authorities could put the survivor or alleged perpetrator at risk of harm. For example, with a report of sexual exploitation, if the survivor and perpetrator are the same sex and homosexuality is illegal, they could face corporal or capital punishment. After the conclusion of an investigation, implementing partners/companies that FCDO invests in are to draw lessons from the case.

**Risk 16: Goods and services are marketed using gender stereotypes or references to physical or sexual violence which trivialises, normalises, and legitimises these acts. Goods can also be used to exercise violence such as GPS tracking devices for mobile phones that are used by stalkers or some video games that centre on male characters that repress women.**

- **Minimum standard:** Creation of gender-diverse bodies within companies that FCDO invests in to review marketing materials from an ethical standpoint. Raising awareness among leadership of the potential of consumer boycotts because of degrading content.
- **Higher standard:** Awareness raising or offering financial support to services for survivors or to programmes to eliminate violence. This can be done by engaging in campaigns and fundraising or through a non-profit branch such as a foundation. Also a portion of the sales of products/services can support survivors of GBV ([Council of Europe 2016](#)).

## Project Completion

**Risk 17: Programme inadvertently contributes to GBV or to exclusion and/or inequality of certain social groups**

- **Minimum standard:** Ensure that the wider risk environment relating to GBV (e.g. gender dynamics in-country where, for instance, increased women's economic empowerment may lead to higher risk of domestic violence) is properly addressed in the earlier risk assessment

and that mitigation measures implemented throughout the project. Include monitoring of GBV as part of any future independent evaluation of the project (if one takes place).

- **Higher standard:** Check in on progress/impacts of the project through active donor groups (non-project specific), liaise with NGOs and local networks on impacts and reports and keep up to date with wider risk environment factors through country office colleagues.

**Risk 18: SEAH and GBV considerations are not built into ongoing plans and operations, and those responsible for those operations are not explicitly required to continue implementation of safeguarding measures**

- **Minimum standard:** ensure agreement that future operations are to meet required standards of FCDO such as via a Memorandum of Understanding. Ensure an effective worker and community GRM is in place and raise awareness of the mechanism. Ensure codes of conduct have all been signed and monitoring plans incorporate SEAH and GBV. Sustainability of safeguarding measures (e.g. GRM/referral mechanisms) to be carefully considered, both at outset and during final year/at completion of FCDO programme (e.g. through technical assistance/signed agreements with organisations responsible for long-term delivery/maintenance etc.).

**Risk 19: Status and performance of SEAH and GBV measures over the programme life are not reviewed at project completion, so future FCDO programmes do not learn and integrate lessons on what does or does not work**

- **Minimum standard:** project completion review process should include documentation and sharing of lessons learned and legacy (e.g. community impact and partner capacity). Return to SEAH and GBV incidences and analyse whether complaints procedures and remediation were adequate.
- **Higher standard:** Suggest ways to partner to improve the complaints procedures and remediation and build capacity.

**Risk 20: SEAH incidents or concerns associated with the programme remain unreported at the time of programme closure.**

- **Minimum standard:** Any outstanding SEAH concerns/incidents that haven't been reported to FCDO's Safeguarding Investigations Team should be reported immediately to the Reporting Concerns hotline.

# Annex 1: Checklist for identifying SEAH and GBV in PSD programmes

This checklist has been developed to help PSD staff comply with the expectations set out in the main guidance note.

## Design

- Have desk-based research, feasibility studies, scoping studies or consultations to inform programme design identified SEAH and GBV risks, mitigation strategies and potential additionalities (i.e. wider benefits of the programme to the community) where appropriate? Have studies been conducted by experts with relevant experience of gender and social inclusion? Have women and other marginalised groups such as people with disabilities been consulted?
- Have individuals who are consulting with stakeholders undergone FCDO enhanced due diligence (or, if downstream partners, thorough due diligence conducted by FCDO's direct partners), followed security procedures, and signed Codes of Conduct? Have partners and community members been sensitised on SEAH-related policies, expected standards of behaviour, rights to safety and protection and reporting mechanisms?
- Has the business case identified the SEAH and GBV risks, identified appropriate mitigating actions, and where possible actions to proactively address SEAH and GBV? Is there a commitment to monitor risks throughout the programme and is SEAH and GBV reflected in the governance structure? Are the human and financial resources allocated for preventing, mitigating, and responding to SEAH and GBV proportionate to the risk?
- Do procurement documents clearly set out expectations around SEAH and GBV, including the necessary capacity and skills of the delivery team in understanding, preventing and responding SEAH and GBV, and requirement to specify management arrangements for SEAH and GBV concerns and to include adequate budgets for survivor-centred prevention and response of SEAH and GBV?

## Mobilisation/ selecting and incentivising delivery partners

- Does the selected implementing partner show good understanding of SEAH and GBV requirements and capacity to address SEAH and GBV? If not, have strengthening measures been put in place, and budgets allocated, to mitigate this? If there are concerns about delivery partners' commitment to SEAH and GBV, have any specific measures been taken to support potential implementing partners to consider SEAH and GBV within their technical and financial bids?
- (Where appropriate) Have the delivery partner(s) been assessed using FCDO's enhanced due diligence in relation to SEAH? Is a clear action plan available that sets out how gaps will be addressed?
- In addition to an SEAH policy, is there evidence of a workplace policy on violence and harassment, including support to domestic violence survivors? Are there codes of conduct signed by all relevant stakeholders and a GRM set up? Is the GRM accessible, well advertised, suitable for the context and survivor-centred?
- Has the implementing partner conducted a basic assessment of SEAH and GBV risks, including within downstream partners and the programme's interactions with the local

community? Have procedures been put in place to mitigate the risk of SEAH and GBV perpetrated by programme staff??

- Does the risk assessment consider how to support staff who may experience domestic violence, and recognise staff groups that are most vulnerable (women, people with disabilities, children, ethnic – religious or racial minorities etc)?
- Do delivery partners (direct and downstream) have strong institutional safeguards in place for staff recruitment (e.g. vetting, reference checks, criminal background checks), induction, and performance assessments?

### Implementation and M&E

- Is there evidence of strong commitment from company leadership, both internally and externally, to gender equality, other forms of social inclusion and workplaces free from violence? Does this include training for all staff on SEAH and GBV and how to report concerns? Is there at least one senior focal point in the company that FCDO invests in that leads this process? Is there a Board member dedicated to safeguarding?
- Are robust reporting mechanisms or GRMs in place for workers and all programme-affected persons to report complaints? Are they being used? If not, why could this be (it may not be because there have been no incidents) and how could they be improved? Are procedures in place to respond to all reports of SEAH and GBV, including referrals to quality financial, child protection, medical, psychosocial, and legal services as needed and conducting survivor-centred investigations? Are procedures in place to support individuals with different needs such as children or people with disabilities? Are responses led by a trained individual who has no potential conflict of interest or bias? Are support and safety needs continuously monitored during and after an investigation?
- Is the lead partner providing ongoing support and capacity development to any partners and contractors in the supply chain to implement FCDO's robust standards on SEAH, integrate GBV where appropriate and comply with the 2020 Supply Partner Code of Conduct?
- Are goods and services marketed using gender-sensitive images and language?
- Does monitoring include field visits by FCDO staff? Are opportunities provided during these visits for people to raise concerns (not exclusive to SEAH and GBV) about the programme? If concerns are raised (including any related to SEAH and GBV) are these dealt with appropriately (according to policies/Codes of Conduct/formal safeguarding procedures in place)?
- Are SEAH and GBV indicators included in the M&E framework (e.g. KPIs linked to gender equality)?

### Annual review

- Have SEAH and GBV risks been adequately monitored and mitigated?
- Are there any new or emerging risks, for example, is the programme going to work with or come into contact with individuals that are at high risk of experiencing SEAH or GBV (for example working close to schools, specifically targeting female workers etc)?
- Are planned SEAH and GBV activities on track and being implemented to a high standard?
- Is the programme drawing on SEAH and/or GBV experts? *Be mindful that poor implementation of GBV and SEAH-related activities can increase levels of SEAH and GBV and put people at increased risk of harm.*

- Are there opportunities (due to the political climate, or capacity within the project team etc) to increase ambition on preventing and addressing SEAH and GBV (e.g. by building additional activities into the programme)?
- Are safeguarding policies and procedures to address SEAH and GBV in place at different levels of the implementation chain (direct partner, downstream partners, contractors, etc)? Is this also the case for any new partners or contractors that may have come on board? Have any gaps identified in the enhanced due diligence been addressed?
- Has the programme received any reports of SEAH or GBV incidents or concerns? If so, have these been managed adequately? What lessons have been learned from these? If not, why not and how could GRMs/complaints mechanisms they be improved?

### **Project Completion**

- Have SEAH and GBV risks been frequently reviewed over the life of the programme and been appropriately prevented, mitigated, and managed? Have appropriate lessons been learned about how future programmes and implementing partner(s) could improve management of SEAH and GBV risks? Have lessons been adequately documented?
- Have cases that were escalated through the GRM or any other reporting mechanisms been adequately responded to? Have GBV survivors been supported (e.g. referred to appropriate services)? Were there any trends visible within SEAH and GBV reports that we could learn from, to better protect people in future programmes?
- Do partners have strong institutional safeguards in place to continue to manage SEAH and GBV risks associated with the programme, report incidents or concerns, and support victims/survivors, beyond the period of FCDO funding?

# Annex 2: Common SEAH and GBV risks found in agriculture, garments, and infrastructure sector programmes

## Agriculture

- Workers not covered by aspects of national labour legislation to protect them from harm.
- Workers are dependent on employers for accommodation, transport, food, or other in-kind benefits creates a power differential which can be exploitative
- Forced labour based on debts and other liberty-limiting practices, especially in relation to migrant workers and victims of trafficking.
- Sexual harassment of female workers on farms or travel to collect water/shelter materials for livestock, which can be in remote or unfamiliar locations.

## Infrastructure

- Remote locations where people have limited access to resources to report GBV and receive support.
- Presence of security personnel who can provide protection but can also abuse their positions of power and status to perpetuate SEAH and GBV.
- Illegal practices undertaken off-site and near communities (e.g. contracting staff using illegal borrow pits near to schools) can put villages/settlements at greater risk of SEAH or GBV.
- Under-reporting of men experiencing sexual harassment and sexual harassment and exploitation of female workers, because of the traditional male working environment.
- Male workers transporting goods (e.g. truck drivers) who can perpetuate GBV and SEAH on routes and at truck stops associated with the project, even if not on the project site.
- Poorly designed or maintained physical spaces on project sites and in worker accommodation. For example, bad lighting in and around grounds and access routes.
- Income-earning opportunities for women through direct employment in construction or operations, or indirect employment (e.g. catering, traders), which may also increase household tension and create community backlash against women in areas where the perception is that they should not work outside the home.
- Once the infrastructure has been constructed there are several risks for women and other vulnerable groups. This includes poor lighting, unsupervised spaces without the physical presence of transport workers/CCTV, absence of emergency buttons, overcrowding and lack of clear codes of conduct.

## Garments

- Supply chains with tight production targets and deadlines that apply strong downward pressure on suppliers. This can increase the risk of supervisors and managers using GBV or SEAH to increase productivity.

- Incentive structures which allow individual supervisors to assess workers' productivity and performance. These can create opportunities for SEAH or GBV, including through the misuse of performance-related pay, bonus schemes and piece-rate systems.
- Long hours and unpredictable shift work that mean women must travel home in the dark and/or on isolated transport.
- Low levels of unionisation, particularly for workers on the lowest tiers of global supply chains as unions can help raise grievances and support workers who have experienced SEAH or GBV.
- Temporary, informal, and migrant workers are at increased risk due to discrimination, job insecurity and lack of support networks. Temporary and agency workers who may be less likely to report SEAH and GBV for fear of losing their jobs.
- Complex subcontracting/supply chains which make it harder to monitor and address SEAH and GBV risks.
- Presence of security personnel, who provide protection but who may also abuse their positions of power and status to perpetuate SEAH and GBV, particularly where they have access to areas where workers sleep.
- Garment workers can also experience violence from their partners, particularly where there are strong gender stereotypes about men being the main breadwinners and women staying at home.



## Annex 3: Further resources

BOND (2019) 20 core elements: a toolkit to strengthen safeguarding report handling, BOND, [https://www.bond.org.uk/sites/default/files/resource-documents/bond\\_20\\_core\\_elements\\_a\\_toolkit\\_to\\_strengthen\\_safeguarding.pdf](https://www.bond.org.uk/sites/default/files/resource-documents/bond_20_core_elements_a_toolkit_to_strengthen_safeguarding.pdf)

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DFID (2019) *Guidance: Safeguarding against Sexual Exploitation and Abuse and Sexual Harassment (SEAH) in the aid sector*, <https://www.gov.uk/guidance/safeguarding-against-sexual-exploitation-and-abuse-and-sexual-harassment-seah-in-the-aid-sector#safeguarding-resources>

DFID and FCO (2019) *'How To' Guidance Note on Gender Equality: A Practical Guide to Integrating Gender Equality into DFID and HMG Policy and Programming*, Department for International Development and Foreign and Commonwealth Office.

EBRD, CDC and IFC (2020) *Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector*, European Bank of Reconstruction and Development, CDC Group and International Finance Corporation.

EBRD, CDC and IFC (2020) *Addressing Gender-Based Violence and Harassment (GBVH) in the Construction Sector*, European Bank of Reconstruction and Development, CDC Group and International Finance Corporation.

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EBRD, CDC and IFC (2020) *Addressing Gender-Based Violence and Harassment (GBVH) in the Public Transport Sector*, European Bank of Reconstruction and Development, CDC Group and International Finance Corporation.

FCDO Safeguarding Unit

FCDO Safeguarding Insight Page, including a generic slide pack of delivering training to external partners.

FCDO (2020) *Enhanced Due Diligence: Safeguarding for external partners*, Department for International Development, <https://www.gov.uk/government/publications/dfid-enhanced-due-diligence-safeguarding-for-external-partners/enhanced-due-diligence-safeguarding-for-external-partners>

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ICED (2019) *Case Studies for DFID advisors on identifying and mitigating SEAH risks in infrastructure programmes [for internal DFID use only]*

ILO (2019) C190- Violence and Harassment Convention 2019 (No. 190), [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C190](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)

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United Nations (2018) Intensification of efforts to prevent and eliminate all forms of violence against women and girls: sexual harassment (A/RES/73/148). UN General Assembly Resolution, <https://digitallibrary.un.org/record/1653108?ln=en#record-files-collapse-header>

UN Women (2019) Guide to Support the Implementation of the Global Women's Safety Framework, <https://www.unwomen.org/-/media/headquarters/attachments/sections/library/publications/2019/guide-to-support-the-implementation-of-the-gwsf-en.pdf?la=en&vs=4846>

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