# Practical guidance on developing a GBVH policy

This note provides practical guidance for companies developing a policy on gender-based violence and harassment (GBVH) in the workplace.

It can be helpful to have a comprehensive standalone GBVH policy, as this sends a strong message on the company’s commitment to tackling GBVH and can be clearly communicated to workers. However, some companies choose to integrate relevant provisions into other policies, such as occupational and safety, non-discrimination or a worker handbook. This note provides guidance that is applicable in both cases.

Overarching considerations in developing a GBVH policy

In developing a GBVH policy, companies should take into account the following points:

Systematic integration into the company’s full policy framework: GBVH policy commitments should be consistent and well-integrated with other organisational policies and procedures. At a minimum, this is likely to include disciplinary policies and procedures, any standalone non-discrimination policy, any whistleblowing policy and policies relating to worker health and safety. GBVH policy commitments should apply across the company and be applicable to all branches and operations.

Senior leadership commitment: There should be clear ownership of the policy development and implementation by senior management, to underline commitment and signal that the GBVH policy is regarded as an institutional priority. This should also be clearly reflected in all communications relating to the policy.

Consultation with workers and their representatives, and other stakeholders. Consultation helps to ensure that the policy is realistic and relevant to everyone who uses it. This consultation should be as inclusive as possible, provide different mechanisms for giving input and involve a diverse group of workers, including women and people of diverse sexual orientation and gender identities where possible. Companies should also aim to leverage expertise from inside and outside the workplace. This might include NGOs, legal experts and GBVH safeguarding specialists who can help ensure that the policy is consistent with national legal requirements and international best practice, and is appropriate to identified GBVH risks. Depending on risks identified, companies may also need to engage specific support, for example child safeguarding experts where there risks are identified relating to children.

Implementation measures. Policies on GBVH must be accompanied by measures to ensure that they are widely communicated to those to whom they apply, and that there are resources allocated to ensure effective implementation and monitoring.

Template GBVH policy

How to use this template:

This template can be drawn on by FIs, funds and companies as a starting point for developing a policy which is tailored to their own operating environment, type of business, and organisational structure and size. It requires users to insert information that will ensure that the resulting policy is relevant to specific circumstances.

This template contains additional considerations for funds, focusing on cascading GBVH policy commitments to investees.

This template may be used as a guide when assessing the adequacy of contractors’ GBVH policies. Where policies and procedures are not in place, this template can be shared with contractors for use in their own operations. See also BII’s guidance for integrating GBVH aspects into GRMs for considerations regarding GBVH with respect to contractor workforces.

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| Purpose and definitions | <Company> is committed to maintaining a safe and respectful work environment. Gender-based violence and harassment (GBVH) is considered unacceptable and will not be tolerated under any circumstances.  GBVH is an umbrella term that covers a range of behaviours, including sexual, physical, psychological and economic abuse, that is directed at people because of their sex or gender, or disproportionately affects people of a particular sex or gender. Women and girls are disproportionately affected by GBVH, but it can also be targeted at anyone.  Sexual harassment is one of the most prevalent forms of GBVH in the work environment. It consists of any form of unwanted verbal, nonverbal or physical conduct of a sexual nature.  GBVH may be a one-off act or an ongoing pattern of behaviour. The following behaviours constitute examples of GBVH:   * Sexual comments or jokes * Sending explicit or sexually suggestive emails or text messages * Psychological harassment, such as bullying * Displaying sexually graphic pictures, posters or photos * Unwelcome hugging or touching * Propositions and sexual advances, including offering financial or employment benefits in return for sexual favours * Physical abuse * <other examples that may be particularly relevant to the company>   Relevant policies and procedures linked to this policy include <state any relevant company policies here, for example relating to grievance procedures, disciplinary procedures, whistleblowing, or non-discrimination>.  Responsibility for this policy lies with <named senior manager with responsibility for policy>.  For any clarification or questions on this policy, workers may contact <named individual, including contact details> |
| Scope | This policy covers all workers, regardless of their contractual status, including employees, temporary contractors, agency workers, interns and volunteers.  This policy is applicable to the workplace, as well as in other work-related settings including work travel, training and social events, in employer-provided accommodation and in communication and interaction between workers, or between workers and clients or customers.  *Additional consideration for funds:* <Fund> – through its environmental and social management system (ESMS) – will also require portfolio companies to develop equivalent and proportionate policy commitments. This will be reflected in relevant legal agreements between the fund and each portfolio company, including the Environmental and Social Action Plan. Specifically, the fund will require each portfolio company to update and integrate the template (or equivalent policy) into their company-level ESMS and/or human resources management system. |
| Legislation | <State the applicable legal framework and key obligations which arise from it>. |
| Behaviour | The following behaviours are expected from all workers:   * To treat all people with respect * To participate in GBVH training * To abide by company policies * To respect the confidentiality of GBVH survivors. |
| Sanctions | <Company> is committed to putting sanctions in place for those who perpetrate GBVH and violate this policy, in line with < reference to company disciplinary procedures>.  Violations of this policy may result in serious consequences, including termination of employment and possible referral to government authorities. |
| Training | <Company> requires all workers to participate in mandatory GBVH training, including <state any mandatory GBVH training provided by the company, for example as part of induction processes>  <Company> also provides enhanced training for all those with specific roles in GBVH prevention and response. <State any enhanced training provided with reference to specific roles>. |
| Reporting and response | <Company> is committed to encouraging, enabling and supporting the reporting of all incidents of GBVH.  A grievance mechanism is available and is accessible through <state reporting channels, including specific staff members who are available to receive grievances>. Workers may also submit GBVH complaints anonymously through <state channel for reporting GBVH grievances anonymously>.  <Company> will seriously consider and follow up on all anonymous reports, but anonymous reporting may mean that there are limitations on its ability to launch a formal investigation in response to anonymous complaints and/or take disciplinary action against alleged perpetrators.  All grievances will be dealt with fairly, following company procedures for investigation <include reference to specific company procedures for investigating GBVH and to specific staff with responsibilities>. In following these procedures, <Company> will accommodate the wishes of survivors, including how they would prefer the issue to be investigated, whether they would like it reported to the authorities and what follow-up actions they would like to be implemented.  <Company> is committed to maintaining strict confidentiality throughout investigations and following the conclusion of the process, regardless of the outcome. Any information relating to GBVH reports will be shared with as few people as possible on a “need to know” basis, and only with the informed, explicit consent of the survivor. Any breach of this confidentiality requirement will be treated as a serious disciplinary matter.  <Company>recognises that false accusations of GBVH can have serious, detrimental effects on innocent persons. If, after proper investigation, it is found that the complainant has maliciously or recklessly made a false accusation, the complainant will be subject to appropriate sanctions, following the procedures set out in <include reference to company disciplinary procedures>.  *Additional consideration for funds:* < Fund> requires portfolio companies to have a grievance mechanism that enables complaints relating to GBVH to be received, recorded, investigated, and managed in a safe and confidential manner. <Fund> requires all portfolio companies to provide regular reporting on the functioning of their grievance mechanism, and to inform <Fund> of any serious GBVH incidents which occur. Complaints relating to GBVH are also accepted via the <Fund> grievance mechanism. |
| Safety and support | <Company> will implement appropriate safety measures to support those who experience or report GBVH, or who witness or participate in an investigation. All such support measures will be agreed with the affected individual(s).  <Company> will not tolerate any retaliation against survivors or witnesses of GBVH, or anyone involved in the investigation procedure. Retaliation includes any action which aims to harass, intimidate or silence an individual, including through verbal or physical threats, or otherwise hindering their work or professional development. Any retaliation against survivors or witnesses will be treated as a serious disciplinary matter under this policy.  <Company> will also make available support services for workers who have experienced GBVH, including referrals to specialist services such as <list of local support services to whom survivors may be referred>. At all times <company> will respect the wishes and choices of the survivor in relation to safety and support measures, including if they do not wish to access any support services. |
| Record-keeping | <Company> will store all data and information, including grievance logs and monitoring records, securely and put in place measures to prevent any unauthorised access and protect confidentiality. |