

# A GENDER-RESPONSIVE HUMAN RIGHTS DUE DILIGENCE TOOL

GIRLS  
ADVOCACY  
ALLIANCE



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## ONLINE

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Girls Advocacy Alliance - A gender...

### PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN PRACTICE, SEE THE REPORT, PART 2.

### PART 3

FOR EACH OF THE SIX STEPS OF GR-HRDD THIS WORKBOOK PROVIDES YOU WITH PRACTICAL CHECKLISTS TO HELP YOU ASSESS YOUR CURRENT GR-HRDD PROCESSES AND IDENTIFY POINTS FOR IMPROVEMENT.

## ACKNOWLEDGEMENTS

The launch of this tool marks the conclusion of a special collaborative initiative of the Girls Advocacy Alliance (GAA). Between 2016 and 2020, three Alliance members joined forces to engage governments and private sector actors to address the discrimination and violence experienced by millions of girls and young women. Plan International Netherlands, Terre des Hommes Netherlands and Defence for Children International Netherlands established the GAA and worked in close collaboration with Global March - the grassroots movement working to end child labour. With support from the Dutch Ministry of Foreign Affairs, the Alliance worked across 10 African and Asian countries, and coordinated lobby activities at multilateral levels (UN, African and Asian regional institutions) and in the Netherlands. GAA members worked and will continue to work closely with companies in The Netherlands, and in particular in Nepal and Bangladesh. GAA's aim is to provide them with a compelling business case and helping hand to help maximise their positive impacts on the lives of girls and women.

This publication is based on conversations with a variety of stakeholders involved in human rights due diligence. Drawn from, amongst others, the garment, dairy, metal, food, spices, banking, and cocoa sectors, companies and industry associations/ networks shared some experiences, challenges, and lessons learnt in fulfilling their human rights responsibilities. Discussions with representatives of the Netherlands Ministry of Foreign Affairs, as well as the Social Economic Council provided further insights on the complexity and possibilities of multi-stakeholder cooperation. Research, tools and guidelines from many other organisations and business case research done by Plan in Bangladesh and Nepal provided useful insights for this tool.

This publication has greatly benefited from the experiences and contributions of diverse gender-focused NGOs and networks with whom we have had fruitful cooperation over the past few years. In particular, we would like to acknowledge the contribution of Fair Wear and Women Win in providing layered gender perspectives on human rights due diligence. With these organisations, as well as with WO=MEN, we had the opportunity to cooperate in various occasions.

As the five-year programme comes to a close, the Alliance hopes that this tool will inspire many more companies to initiate lasting changes within their companies and broader business environment for the benefit of girls and young women worldwide.

## EXECUTIVE SUMMARY

There is a growing need to demonstrate to your customers and other stakeholders, that you are a socially responsible, ecologically sustainable and profitable business. You know that respecting human rights within your workplace and broader supply chain is the good thing to do. It may even be that you are personally convinced that treating people with different gender identities equally is economically smart.

You are not alone. Many businesses strive to “do the right thing” for society, the environment, and (naturally) their own bottom line. But doing the right thing can become a complex undertaking. Especially as the business environment becomes ever-more competitive, natural resources dwindle, government regulations tighten, and societal pressure grows for gender equality (triggered amongst others by #MeToo, demands to break the class ceiling for women, consumer interest in decent work environments for women, etc.).

This is what this tool is about. It enables you to reap the benefits that gender equality has on profitability, productivity, creativity, innovativeness, retention and brand reputation, while simultaneously eliminating or at least reducing gender-specific human rights risks and their negative impacts in your business operations. We refer to this as exercising ‘Gender-responsive Human Rights Due Diligence’ (GR-HRDD).

So, what does this entail in practice? Simply put, it is aiming for gender-equality by ensuring that you are consistently applying a gender “lens” as you define your policies, assess risks and gaps, develop action plans, monitor, report, and operationalise your human rights compliance. This, however, is not a simple box-ticking exercise. GR-HRDD is about much more than ensuring that you have an “equal” number of male and female employees, or have policies in place to deal with sexual harassment. It requires a deep understanding about the underlying socio-economic dynamics that contribute to unequal gender relations. It could involve, for example, identify structural barriers that may relegate women to the lowest-paid cadres of your workforce, or acknowledging the stigmas that prevent workers of all gender identities from contributing to their fullest potential, getting the promotions they deserve, and fully enjoying their rights and freedoms. Even though gender refers to more than men and women only, this GR-HRDD tool focusses on women since they constitute the majority of employees who face gender-specific risks, discrimination and inequality.

As the name implies, GR-HRDD expands on existing requirements for businesses to comply with human rights principles, which are set out in diverse national and international legal frameworks. Among these are the [UN Guiding Principles on Business and Human Rights](#), the [OECD Guidelines](#), and the various conventions of the International Labour Organization. With the adoption of the [2030 Agenda for Sustainable Development](#) and its 17 Sustainable Development Goals, businesses are also increasingly called upon to play a greater role in creating a more equal, inclusive and sustainable world.

### Investing in gender makes business sense

Diverse (global) studies have consistently found that companies that actively pursue gender equality (including at the management level) benefit from, among others: higher profitability (between 5% and 20%); higher productivity; lower volatility in return on capital; increased ability to attract and retain talent; greater creativity, innovation and openness (19% higher innovation revenue); enhanced reputation; and the ability to better gauge consumer interest and demand.

It may sound like a complex undertaking, but as the case studies referenced across this tool attest, it pays to invest in gender equality. Perhaps even more significant, these positive examples of gender-sensitive business practice are drawn from sectors that are traditionally associated with widespread human rights abuses: ready-made garments, tourism and hospitality, and agrifood (cocoa). These experiences therefore offer reassurance that, more than simply meeting the minimum due diligence requirements, businesses can proactively contribute towards empowering women and girls, and redressing unequal gender relations in workplaces, supply chains, and within broader society, while simultaneously having a positive effect on the top and bottom line.

Beyond these direct benefits, companies that embed gender-sensitive practices across their operations, and progressively building on the lessons learnt, can become effective agents of change in achieving gender-inclusive, and sustainable development along the lines of the 17 Sustainable Development Goals.

**What GR-HRDD entails**

Organised around the six steps of Human Rights Due Diligence, this toolkit offers a conceptual framework, as well as practical guidance for planning, implementing, and monitoring your GR-HRDD processes. It guides you through the process of: (1) defining a gender equality policy; (2) identifying gender-specific human rights risks; (3) designing measures to mitigate these risks; (4) monitoring your progress and results; (5) communicating outcomes; and (6) remedying any violations that may occur.



At each of these six steps you should address 9 human rights principles (that you as a business can directly influence) with attention to the gender specific issues women face. Workers of all gender identities should face no discrimination in recruitment, career opportunities and training. They should receive and have control over fair wages with which they can make a living. Thirdly, workers should be able to work reasonable hours voluntarily. Next, they have to be allowed to freely choose their work and not be subjected to forced labour. Fifth, workers should never be harassed or abused. A sixth human right is that workers must be able to work in safe and healthy environments with adequate facilities. Male and female workers also have the right to organise themselves and bargain collectively for their labour conditions. The eighth right is for workers to have legally binding employment relationships. Finally, workers should have access to, use of and control over land and safe natural resources.



Using this GR-HRDD toolkit will help you and the teams involved gain a better understanding on how to achieve gender equality by addressing nine human rights principles with a “gender lens” in your own business context. You will gain clear insights on how applying a gender lens benefits your workers and stakeholders, how these principles can be addressed in your policies, risk assessment, mitigation measures and remedy, and how to leverage the results of your GR-HRDD processes to enhance your business performance and your brand value as a human-rights compliant, and gender-responsive brand. Staff active in day-to-day operations such as those working in marketing, procurement, production, HR or legal affairs can benefit from the tool by incorporating the insights and good practices in their policies and daily activities. The GR-HRDD tool may also be beneficial for executives who want to showcase their company’s human rights credentials to shareholders. In a word, this tool can benefit all who are responsible for “gender responsiveness.” It will help you gain a better understanding of what this means, why and how it benefits stakeholders, how it adds value to your company, and how to exercise GR-HRDD in practice.

To maximise the effectiveness of this GR-HRDD, it is best incorporated within your overall business strategy and operations planning. It is also essential to involve a broad cross-section of your internal and external “stakeholders” – including female and male workers, representatives of employee unions and management, suppliers, community-based organisations in your area of operations, specialised NGOs, women’s rights organisations and academic institutions, and relevant government institutions. This will help you anticipate gender-related human rights risks in your business environment, proactively plan for new regulatory frameworks, and maintain good relationship with your consumers and broader society.

### **The critical role of executives**

A strong commitment to gender equality and the tone set by corporate leadership and senior management ensures that all the stakeholders have a common understanding of the company’s standpoint on gender and human rights, are empowered to take action where needed, and know that non-compliance is unacceptable.

As executives you can guide your company to go beyond a ‘do no harm’ approach, transform gender relations across your business operations, and make a real contribution to advancing the rights of women.

Having senior management commitment helps to initiate internal conversations, signals the importance of the process, and ensures that gender policy is embedded strongly and in a complementary fashion in your company’s overall policy and management system.

### **Using the GR-HRDD tool to your benefit**

The toolkit consists of three separate books and is organised in such a way that users can quickly navigate to the instruments they consider to be most relevant to their needs.

The first chapter of this first book discusses the overall rationale for undertaking GR-HRDD, with an overview of key instruments at international and national levels that govern such due diligence processes. The second chapter sets out the business case for undertaking GR-HRDD, with some global studies from renowned institutes and consultancies, and illustrative cases from diverse (global) businesses.

Chapter 3 introduces the six steps of the GR-HRDD tool and explains how it interfaces with the nine international human rights principles that you as a company can influence.

Starting a full-fledged GR-HRDD approach spanning your whole business without knowing your starting position might not be a good idea. Therefore, we provide you in chapter 4 (and its accompanying workbook) with a GR-HRDD Maturity Assessment to take you through a simple, but systematic process of identifying your level of GR-HRDD maturity. You can do this assessment for a few of your business units, for the company as a whole, or even together with your suppliers. This will help you choose the best entry point for launching, or expanding on, your GR-HRDD process.



The fifth chapter complemented by the two other books (“applying GR-HRDD in practice” and “workbook”), helps you take a deep dive into the actual process. We empower you with explanations, insights, good practices and practical checklists and templates to address the nine human rights principles in each of the six steps of Human Rights Due Diligence. You can apply the GR-HRDD tool in incremental steps, such as: strengthening your gender policies to inform more practical interventions; “piloting” a GR-HRDD approach within one specific product category, and its associated suppliers; and then building on the lessons learned to expand to your other product categories and supply chains. Another incremental approach could be to start in one or two production locations in a country, consider other locations within the country, and then add more countries.



The final chapter of the first book recaps the business case for GR-HRDD and some key considerations for practice. It concludes with an open call to users to share your own business cases, insights gained from applying the tool and its instruments in diverse business contexts, and policies and measures applied that have proven to be effective. This input will be invaluable in continuously updating and improving the effectiveness and usability of this tool for you and other companies across the globe.

At the end of this book, you will find a list of additional helpful resources that you can use in your GR-HRDD process and a **quiz** to get acquainted with gender facts in a fun way.



### Time to act

Many businesses are overwhelmed with the consequences of the current pandemic and resulting economic crisis. But looked at it in a different way, they offer a window of opportunity for companies in many sectors to assess (gender-specific) human rights risks in their supply chains, as they seek to build a more resilient, and sustainable business. Build back better in this context means build back fairer and bringing gender equality to the core of employment recovery. It is critical now to ensure that women lead and participate fully in decision-making on recovery.

The task of confronting gender inequality is immense, and is further exacerbated by COVID-19 and other complex crises that are unfolding before our eyes. But that should not stop us. History has shown that private sector actors are capable of addressing complex societal problems. They may not develop all-encompassing plans and blueprints, but they can unleash tremendous entrepreneurial spirit, perseverance, and a “learning by doing” mentality. It also helps to know that you are not alone in this endeavour. Many other companies are already experimenting with different ways of becoming more gender responsive in their day-to-day business practices. And an array of other actors – who include government agencies, NGOs, labour unions, and universities – not only wish you well, but have a real stake in your success. Together, they have assembled a rich body of resources to help you get started, or to sustain your progress.

Designed to tap into this collaborative spirit, we hope that this toolkit will help galvanise even more momentum and support for companies who have embarked on the journey to becoming truly gender responsive, and hence maximise their positive impact on girls and women.

To get a concrete grasp of what GR-HRDD entails we provide you with a one-page summary of each of the six steps of GR-HRDD. These summaries include good practices to apply per step, examples of gender-equality policy statements, gender-specific human rights risks you will face, practical risk mitigating measures, insights on monitoring and learning, communication goals per target audience, and insights on how to set-up grievance and remediation mechanisms.



## STEP 1: EMBED GENDER EQUALITY INTO YOUR POLICIES & MANAGEMENT SYSTEMS



Your first step is to establish a corporate ambition & policy aimed at achieving gender-equality (GE) which is embedded in your corporate governance, and understood, embraced and supported by all stakeholders.

### 8 GOOD PRACTICES TO APPLY IN DEFINING & EMBEDDING YOUR GENDER-EQUALITY POLICY

1. Executive are committed to achieve GE & respecting human rights in appropriate balance with other business priorities & resources.
2. Relevant stakeholders agree on the importance of GE and help to define an inspiring yet achievable gender-equality policy.
3. GE policy refers to (inter)national law to ensure legal compliance from the outset.
4. GE policy is an integral part of and builds on your corporate (HR) policies, including departmental policies & external covenants.
5. GE policy statements are defined for all 9 human rights principles and formulated in a gender-sensitive manner.
6. GE policy is translated into (Supplier) Codes of Conduct that give employees & suppliers practical guidelines they have to adhere to.
7. The governance model defines roles, responsibilities & accountabilities regarding gender-sensitive human rights & gender equality.
8. GE policy is shared with all rights holders and all internal & external stakeholders who have a role to play in its implementation.

### EXAMPLES OF PRACTICAL GENDER-EQUALITY POLICY STATEMENTS FOR THE 9 HUMAN RIGHTS PRINCIPLES

#### Workers face no discrimination in recruitment, employment and training

- We equally, fairly & transparently recruit, promote, and reward men & women.
- We recruit women & men equally across functions and levels & prevent career set-backs due to pregnancy or parental leave
- We provide for equal training opportunities during business hours for men & women to empower and school themselves.

#### Workers receive fair wages & benefits at a living wage level

- Our wages and benefits always meet the living wage standard and embrace a price strategy that incorporates 'true costs & living wages'
- We ensure equal income for men & women for similar tasks, & do not allow wage deductions for gender-related disciplinary measures.
- We ensure that all employees have full and unlimited access to their own bank account into which salaries and benefits are deposited.

#### Employees work reasonable hours at decent conditions

- We place timely & stable production orders that meet production capacity of suppliers without need for (involuntary) overtime.
- We explicitly forbid our staff and suppliers to punish, retaliate against, or penalise women & men who refuse to work overtime.
- Overtime in our company & suppliers is always voluntary, recorded, paid-out at 150% of regular wages, & never exceeds 12 hrs / week.

#### Workers freely choose their work, and are not forced, bonded, or obligated to work

- We explicitly forbid any kind of modern slavery and human trafficking and never require employees to make a payment to secure a job
- We forbid confiscation of ID's, withholding of wages or obligatory deposits by employees to ensure their return to work after time-off.
- We forbid confinement of and physical force against men & women, and they are free to choose their own housing accommodations.

#### Workers are not harassed or abused

- We forbid abuse, harassment, unwanted sexual advances, and use of offensive and sexually-explicit language that physically, psychologically and/or sexually embarrasses, humiliates, intimidates, annoys and/or alarms women & men.
- In working situations with a predominantly female workforce, we use female rather than male overseers and managers.
- We take preventive measures such as safe transportation, safe facilities and safe surroundings for female & male employees.

#### The work environment is safe and healthy, and workers have access to basic needs and services

- We provide a safe & hygienic working environment that meet all gender-specific needs of women & men.
- We apply and ensure female- and male-friendly practices and facilities in the workplace
- We provide for mandatory safety trainings for women and men during regular working hours.

#### Freedom of Association and the Right to Collective Bargaining are respected

- We inform & train managers, suppliers & workers about the right of employees to organise themselves in workers' councils and unions.
- We stimulate & facilitate unions and workers' councils to admit women in leadership roles to represent gender issues.
- Threatening or bullying of or committing violent actions against those who join a trade union or workers' council is forbidden.

#### Workers have a legally binding employment relationship with clear contracts and conditions

- We offer protection and job security for workers in both permanent and flexible employment arrangement.
- We only use certified & registered recruitment agencies who themselves apply gender-responsive policies.
- We limit outsourcing to small (informal) suppliers, unless these are female owned & strengthens female economic empowerment.

#### Workers can own land and have access to safe natural resources

- We don't destruct or pollute living environments, restore damages & support women & men in their sustainable economic activities.
- We don't monopolise or excessively use natural resources & involve men & women equally in decisions affecting access to resources.
- We only use land that is not claimed, or owned by locals, and apply the right to free, prior & informed consent of female & male locals.



## STEP 2: IDENTIFY & ASSESS GENDER RISKS & ADVERSE IMPACTS



In this step you comprehensively assess the likelihood of gender-specific human rights risks occurring, their impact on rights holders, and the urgency these risks must be mitigated. You also analyse their root causes to determine how to effectively mitigate them and structurally address the underlying causes.

### 5 GOOD PRACTICES TO IDENTIFY & ASSESS GENDER-SPECIFIC HUMAN RIGHTS RISKS & THEIR ADVERSE IMPACT

1. Relevant stakeholders (incl. suppliers) help to identify & assess gender-specific human rights risks and their impacts on women & men.
2. All possible internal & external risks as well as the data / risk indicators needed to identify actual risks, are known upfront.
3. For all potential risks the likelihood of occurrence & the specific impact on women & men are identified to prioritise mitigation efforts.
4. For internal risks, root causes are analysed to identify effective mitigating measures that tackle negative impacts & underlying causes.
5. External risks (e.g. political, economical, technological, legal, environmental, social & health-related) are assessed through a gender-lens to understand if they may have a disproportionately higher likelihood of occurring and/or a higher impact on women versus men.

### EXAMPLES OF GENDER-SPECIFIC INTERNAL RISKS RELATED TO THE 9 HUMAN RIGHTS PRINCIPLES

#### Workers face no discrimination in recruitment, employment and training

- Discrimination of women in recruitment and recruiting women mostly for lower-level roles.
- Limited career opportunities for women, or even termination following marriage or pregnancy.
- Less training opportunities for women.

#### Workers receive fair wages and benefits at a living wage level

- Wages, overtime pay, benefits, and paid leave for women are below a living wage.
- Lower wages, overtime pay, benefits, and paid leave for women is less than for men.
- No personal bank account and/or wage payments in cash, and no financial support to female (agriculture) producers in their own right.

#### Employees work reasonable hours at decent conditions

- Unrealistic daily targets, and overtime too frequently needed, which women find hard to refuse.
- Punishment, retaliation, or penalties for workers who refuse to work overtime.
- Overtime not always recorded, and/or not paid out for full.

#### Workers freely choose their work, and are not forced, bonded, or obligated to work

- Exploitative practices such as modern slavery, human trafficking, and unknown or last-minute changes to employment contracts.
- Confiscation of personal ID's (so women & men cannot leave the country or apply for social security) and withholding wages.
- Confinement and threats of physical force.

#### Workers are not harassed or abused

- Unwanted & offensive sexually-explicit language, sexual advances, abuses, threats, intimidation and/or assaults of women while at work, resulting in physical, psychological, and/or sexual embarrassment, humiliation, intimidation, annoyance and/or alarm for women.

#### The work environment is safe and healthy, and workers have access to basic needs and services

- Unsafe working environment, lack of PPE, unsafe commuting to work & poor safety measures that expose staff to gender-specific risks.
- Unhygienic working environment with inadequate, or no facilities for women (e.g. breast-feeding locations, storage for milk).
- Poor safety training for women & men.

#### Freedom of Association and the Right to Collective Bargaining are respected

- A lack of awareness about women's human right to associate and engage in collective bargaining.
- Poor representation of women in unions (including at leadership levels) & obstruction of women to participate in unions.
- Being disproportionately subjected to threats, bullying, physical assault, or even murder for joining or working for a trade union.

#### Workers have a legally binding employment relationship with clear contracts and conditions

- Poor job security and no protection for women in flexible employment arrangements.
- Use of unscrupulous recruitment agencies.
- Outsourcing to smaller (informal) suppliers and female contract workers, with accompanying low incomes & benefits.

#### Workers can own land and have access to safe natural resources

- Lack of, or low recognition of property rights for women, and their marginalisation as important stakeholders in natural resource usage.
- Lack of women's participation in decision-making processes that affect ownership of & access to land, property and natural resources.
- Displacement of locals from their land to make way for economic activities without free, prior & informed consent of women.



## STEP 3: CEASE, PREVENT OR MITIGATE GENDER-SPECIFIC HUMAN RIGHT RISKS



This step is about proactively & reactively adapting policies, decisions, processes & operations to cease, prevent or reduce gender-specific human rights risks and prevent negative impacts on rights holders.

### 6 GOOD PRACTICES TO CEASE, PREVENT OR MITIGATE GENDER-SPECIFIC HUMAN RIGHTS RISKS

1. Cease activities, or find alternatives to eliminate the risks, and hence remove the negative impact on rights holders.
2. Create a roadmap to cease activities that require difficult & time-consuming responses due to operational, contractual or legal issues.
3. Use your leverage & provide incentives to suppliers to cease business activities that cause gender-related risks.
4. Guide & train managers & staff on gender-specific risks, mitigating measures & necessary changes in their own behaviour.
5. Defer decisions that “lock in” a risk & take time to understand the risk, find ways to eliminate or reduce it, or even cancel the action.
6. Identify, design & test responsive strategies & empower women to enhance resilience to deal with external risks.

### EXAMPLES OF MEASURES TO MITIGATE RISKS

#### Workers face no discrimination in recruitment, employment and training

- Publish gender-neutral vacancies, allow candidates to withhold gender information, train staff in non-discriminatory recruitment methods, involve women in career progress decisions, & set minimum targets for men & women across all functions & hierarchies.
- Link executives' pay & bonuses to GE targets.
- Prohibit negative career-related decisions by managers based on gender-specific situations like pregnancy or maternity leave.
- Make education & training mandatory for women & men and set corresponding management targets to enable attendance to trainings.

#### Workers receive fair wages and benefits at a living wage level

- Company & suppliers bear the costs of recruitment fees, advances, etc., & pay a substantially higher wage for involuntary overtime.
- Flag sudden deductions from wages to check if these don't result from disciplinary measures.
- Support female employees to open a bank account to safely receive their salary and other payments (wage digitisation).

#### Employees work reasonable hours at decent conditions

- Prohibit managers & suppliers from setting targets so high that (female) employees must work overtime to earn a living wage.
- Ensure sales targets & procurement orders don't fluctuate beyond pre-specified boundaries & require overtime to meet the targets.
- Provide training to managers to ensure they do not punish, retaliate against, or penalise employees that choose not to work overtime.

#### Workers freely choose their work, and are not forced, bonded, or obligated to work

- Inform all workers that they cannot be charged (recruitment) fees or be required to leave a deposit and don't have to hand-over ID's.
- Pay all wages, including for overtime, within the legally defined time limits or at least once a month.
- Facilitate employees to look for comparable accommodation alternatives if they do not want to be housed in company-owned facilities.

#### Workers are not harassed or abused

- Work with mixed-gender teams of overseers & security guard, provide safe transportation for employees & limit use of informal labour.
- Promote gender-responsible behaviour by showcasing & rewarding good practices.
- Train all staff in the impacts of (gender-based) abuse, threats, intimidation, or assault, and the consequences perpetrators will face.

#### The work environment is safe and healthy, and workers have access to basic needs and services

- Provide adequate OHS, safe food & water, hygienic sanitary facilities & protection against dangerous chemicals for male & female staff.
- Staff your on-site clinics with female doctors & nurses to provide adequate support for sexual, reproductive and mental health.
- Train all managers & workers (in the gender-specific safety & hygiene measures).

#### Freedom of Association and the Right to Collective Bargaining are respected

- Inform & train all staff & suppliers about the right of employees to organise themselves in workers' councils and unions.
- Encourage unions & workers councils to recruit female leaders & ensure women's equal participation in consultations & negotiations.
- Protect female employees who have organised themselves and/or have joined a union or workers' council.

#### Workers have a legally binding employment relationship with clear contracts and conditions

- Work with suppliers, NGOs & government to expand formal jobs & ensure equal access to employment opportunities for women & men.
- Set targets for sourcing from women-owned businesses and collaborate with them to continuously improve their operations.
- Work with suppliers to improve operations & flexibility (to absorb fluctuations in demand) to reduce outsourcing to informal contractors.

#### Workers can own land and have access to safe natural resources

- Facilitate your business units & suppliers to produce sustainable products, recycle waste & limit the use of pollutants & scarce resources.
- Work with (female-owned) start-ups or create your own spin-offs to use your waste in new products.
- Ensure that women participate in decision-making processes that affect the use of community & private property and natural resources.



## STEP 4: TRACK PROGRESS ON GENDER EQUALITY



Achieving GE, empowering women & reaping the benefits, is a long-term effort that requires stamina, learning from past mistakes, leveraging proven good practices, constant fine-tuning, and keeping internal and external stakeholders well informed and actively engaged. This requires you to monitor your GR-HRDD implementation efforts, your actual progress, as well as unexpected hurdles you may have faced. These insights provide the ingredients for learning and continuous improvements.

### 8 GOOD PRACTICES TO TRACK PROGRESS & MAKE CONTINUOUS IMPROVEMENTS IN YOUR GR-HRDD EFFORTS

1. Ensure that key staff is committed to tracking & improving your GR-HRDD efforts, since this improves the effectiveness of your policies, investment decisions, resource allocation, and improves transparency towards & relationships with shareholders, customers, NGOs, etc
2. To effectively & efficiently monitor & improve your GR-HRDD efforts & outcomes, work with a few KPIs with clear targets for which data & measurement tools are available and which will provide you with credible results.
3. Avoid the pitfall to monitor only what can be easily measured, rather than what is truly important to monitor & undertake supplementary field-studies to gather anecdotal evidence from those affected by gender-related human rights abuses.
4. Monitor GR-HRDD progress & outcomes in your own operations and those of suppliers with periodic (un)announced (social) audits, including useful & rigorous audits that are a part of third-party certification schemes that pay attention to human rights risks.
5. Stimulate managers & suppliers to conduct self-assessments to comply with GE policy without pressure from head office or customer.
6. Ensure that the monitoring approach is gender inclusive, addresses gender-specific norms & values, is conducted by gender-balanced, independent & experienced audit teams, uses proven monitoring methods, and is fed with data disaggregated by gender.
7. Experiment with rapidly emerging M&E instruments that sprout from the digital revolution. Artificial intelligence, block chain, drones, crowd-auditing & satellite tech offer more efficient, augmented or even new insights in the human rights issues at play in supply chains.
8. To maximise your learning & stimulate truly transformative improvements that involve changes in values, norms and beliefs, ensure that your learning approach includes single-, double- & triple-loop learning within your own company and its suppliers.

### EXAMPLES OF KPIs TO MONITOR & IMPROVE YOUR GR-HRDD EFFORTS & OUTCOME

GR-HRDD performance areas	KPIs
I Policies and processes (as part of the six steps of your GR-HRDD) that promote GE and address prominent gender-specific human rights issues	<ol style="list-style-type: none"> <li>1. % coverage of the GR-HRDD approach by well-documented and by management endorsed policies, risk management processes, grievance mechanisms, etc</li> <li>2. % of gender-specific risks for which root causes are identified &amp; accepted by key stakeholders.</li> <li>3. # of interventions to reduce the likelihood of gender-related risks occurring and/or their impact</li> <li>4. # of gender-specific indicators defined, included in audits and analysed.</li> <li>5. # of stakeholders informed on GE policies, activities and results achieved.</li> <li>6. # of incidents reported and resolved satisfactorily for affected parties.</li> </ol>
II Awareness, competencies & beliefs of managers & workers across your supply chain of GE policy & GR-HRDD efforts	<ul style="list-style-type: none"> <li>o Rating of staff of their knowledge &amp; acceptance of GE policies &amp; GR-HRDD efforts</li> <li>o % of management &amp; workers (identified as playing a key role in the process) trained in all aspects of GR-HRDD and good practices to achieve GE</li> <li>o % women &amp; men who are convinced that GE must be achieved &amp; is beneficial for all.</li> </ul>
III Outcomes of your GR-HRDD efforts to drive positive impact for workers of all gender identities (related to the nine human rights principles)	<ol style="list-style-type: none"> <li>A Ratio of women / men in management positions</li> <li>B % women who get paid at least the living wage level</li> <li>C % women who work overtime voluntarily</li> <li>D # of women with paid wages within legally defined time limits</li> <li>E # women who experience less or no harassment &amp; abuse</li> <li>F % women who feel that health &amp; well-being needs are adequately addressed</li> <li>G # female members &amp; leaders of producer associations, unions, and workers' councils</li> <li>H % women with employment contracts that safeguard wages, benefits, hours &amp; working conditions</li> <li>I % women who can own land, and have access to safe natural resources</li> </ol>
IV Grievances received & remedies provided related to the nine human rights principles	<ul style="list-style-type: none"> <li>o # of actual grievances regarding violations of the nine human rights principles &amp; your GE policy that happen despite your GR-HRDD efforts</li> <li>o # of actual cases remedied to the full satisfaction of the complainant(s) and with appropriate sanctioning of the perpetrators</li> </ul>



## STEP 5: COMMUNICATE HOW IMPACTS ARE ADDRESSED



To inform your stakeholders, engage & commit them to achieve gender-equality and mitigate & remedy gender-specific human rights risks, you should communicate with them from the moment you start thinking about the relevance of gender-equality use it as an essential means to reinforce all your GR-HRDD efforts. Your company's communications and branding offer a crucial platform for showcasing your commitment to GE & breaking gender stereotypes. This helps to create a culture & atmosphere of trust, commitment & joint ambition

### 10 GOOD PRACTICES TO COMMUNICATE HOW IMPACTS ARE ADDRESSED

1. Be as clear as possible on who you would like to communicate with, and what you want your stakeholders to know, believe and do. "Touch their heart."
2. Communicate with employees & unions to help them understand why GE is worth striving for, what you are doing, what results are achieved & what they themselves can & must do to achieve it & comply with your policies. Your efforts should instil sustainable change amongst staff by challenging their own ideas about gender & norms about what behaviour is acceptable.
3. Your company proudly serves a broad range of customers with different expectations about responsible business conduct in general, and GE in particular. Through communication you can strengthen your brand perception, what you are doing for the benefit of women, men & nature, gain customers' trust & raise their willingness to buy from you.
4. Your communication with suppliers should focus on what your GE policies, and the resulting supplier codes of conduct, mean for your them. You can highlight how living up to them not only safeguards their position as your supplier, but also strengthens their competitive power amongst peers. Another possible angle in your communications is to expose suppliers to a different view, and hence create a counter-narrative on typical negative gender norms and values.
5. Your entry point in talking to shareholders & lenders is to provide them with a solid case to support your investments in GR-HRDD and/or inform them that you actively comply with their conditions. In particular, you will want to highlight how investing in GE helps improve your company's top- & bottom-lines, as well as its competitiveness & innovativeness.
6. Communication with governments should focus on both compliance with their laws & regulations as well as the positive changes society wants to achieve with help of governments. As a private enterprise you can also engage in a "transformative push" to challenge governments' ambitions or overturning gender stereotypes and biases.
7. Your communication activities with NGOs focus on informing them about your GE ambition, GR-HRDD plans, progress, results & challenges with which they might be able to help you. It also helps to instil a level of trust in your company that will result in a more positive portrayal of your company amongst NGOs & their rank & file.
8. Not only the content, but the tone of your visual, verbal & written communication expresses what your company really thinks about gender-based human rights and how important achieving gender-equality truly is. In practice, gender-sensitive communication boils down to, among others: ensuring an inclusive approach in all kinds of communications; equally representing different gender identities in your audio-visual materials; not defining women and men through their gender roles alone; and preventing depictions of women and men as objects of violence and sexuality.
9. Irrespective of your company's communication goals, all your stakeholders want your communication to be clear, honest, relevant, timely, representative & easily accessible.
10. In addition to the corporate company's story itself, authentic stories of the actors in the value chain are of value. Let the small farmers in Ethiopia, the young women in the sweatshops in Bangladesh, the factory owner in China, the cashier in Germany, and the warehouse workers in The Netherlands tell real time about the changes they may or may not be experiencing in the way they operate, their working conditions, their lives or in their community: stories about the true impact achieved. Ultimately, no KPI can beat such stories!



## STEP 6: PROVIDE FOR OR COOPERATE IN REMEDIATION WHEN APPROPRIATE



Despite substantial efforts to mitigate gender related risks, a company may still encounter violations of its GE policy, resulting in (severe) impacts. These incidents may occur within the company itself or be reported among its suppliers and subcontractors. It is for this reason that companies have to provide workers & other rights holders with a mechanism through which they can report grievances. Once reported, the company must also investigate these grievances and provide remedies to restore individuals or groups that have been harmed by a business's activities to the situation they would have been in had the impact not occurred. It goes without saying that the company must also firmly deal with the perpetrator in a manner that fits the seriousness of the harm caused.

Good grievance & remediation mechanisms have a positive impact on trust, labour-management relations, retention, productivity, production quality & profitability.

### 5 GOOD PRACTICES RELATED TO GRIEVANCE MECHANISMS

1. In the context of GR-HRDD four grievance mechanisms should be considered:
  - Internal grievance mechanism for company's own staff (or their representatives or witnesses) to report violations of the company's GE policy that occur within the 'boundaries' of this company;
  - External grievance mechanisms for employees of a supplying company to file formal complaints with the buying company, which can push for remediation by the supplier since it may constitute a violation of Supplier Codes of Conduct & procurement contracts;
  - Multi-stakeholder grievance mechanisms in which companies participate for employees of members of this multi-stakeholder initiative to file formal complaints, which will then be addressed by the lead agency with the member firm(s) involved;
  - Community grievance mechanisms developed for community complaints related to a high-impact project that can have potentially significant consequences for local communities around the project (e.g. developing a resort, a golf courses or a mine, etc.).
2. Use your grievance mechanisms to (a) address problems before they escalate & actually do harm, or if harm has already been done, (b) understand the impact of (gender-specific) human rights violations, (c) determine (beyond doubt) the perpetrators & root causes, (d) remedy the wrongs done, compensate those who have been harmed, and (e) feed directly into long-term GR-HRDD improvements.
3. Ensure trust in the grievance mechanism by
  - collaborating with relevant stakeholders in the design, training of managers & staff in the workings of the mechanism, safeguarding privacy & anonymity of complainant & alleged wrongdoer, and guaranteeing transparency.
4. Establish a clear grievance process with predictable timelines for due process of each step of the process as well as types of inputs, output and outcomes per step. Put in place equitable procedures to conduct unbiased and independent investigations to find out both what happened, who is involved, who is accountable, and what the underlying root causes are of the violation.
5. Staff the grievance mechanism with skilled & experienced people and take full accountability for the fair conduct of grievance processes.

### 5 GOOD PRACTICES REGARDING REMEDIATION MECHANISMS

- A. Engage the workers' union (including its female members), women's organisations & gender experts, to develop victim-centred & contextually relevant remediation approaches and to identify appropriate deterrents, punishments & corrective remedies.
- B. Inform all rights holders about available company-issued & judicial remedies and ensure that they may freely access these.
- C. Provide for recovery such as medical & psychological care and legal & social services such as shelter & counselling.
- D. Adequately compensate victims or dependants for the harm & loss suffered, by reimbursing them, acknowledging the violation of the victim's rights, ensuring the violation stops, and providing programmes for women & men to improve career prospects.
- E. Impose punitive sanctions (e.g. fines, demotion, or dismissal) on the wrongdoer to match the scale of the human rights infringement. And bring perpetrators and evidence of their wrongdoing, to the attention of authorities to initiate & facilitate prosecution.

### 3 GOOD PRACTICES TO UPDATE YOUR GE POLICY & GR-HRDD APPROACH

- I Based on insights gathered through your grievance & remediation mechanisms you can & should revisit & improve your GE policy, (supplier) code of conduct, mitigating measures & sourcing practices, to limit risks & prevent adverse impacts.
- II Evaluate the effectiveness of the grievance & remediation mechanisms themselves to improve them.
- III Communicate the updated GE policy, operational guidance, (supplier) code of conduct & sourcing practices with all staff & suppliers.





# 1 WHY THIS TOOL?

## 1.1 LINKING GENDER TO HUMAN RIGHTS DUE DILIGENCE

The rise of social movements such as #Me Too, LGBTIQ+<sup>1</sup>, and Black Lives Matter, has triggered intense public debate around issues of power, entitlement, and marginalisation. Most recently, the COVID-19 pandemic – with its disproportionate impact on women, and other marginalised groups – has further highlighted the need for urgent action to prevent existing inequalities from becoming even more entrenched.<sup>2</sup>

Private companies are not only expected to address gender inequality within their business operations, they are under growing pressure to take a public stand on such injustices.

An ever-increasing number of companies subscribe to the [UN Guiding Principles](#) (UNGPs) on Business and Human Rights, as well as related [Guidelines for Multinational Enterprises](#) developed by the Organisation for Economic Cooperation and Development (OECD). This indicates growing awareness that it makes business sense for companies to act responsibly and sustainably. It is perhaps not surprising that many of the most successful companies, ranging from start-ups to established global brands, pursue human rights principles in their corporate strategies and governance models.

### A focus on human rights makes business sense

*In order to identify, prevent, mitigate and account for how they address their adverse human rights impacts, business enterprises should carry out human rights due diligence - UN Guiding Principle 17*

**Human Rights Due Diligence (HRDD)** is one of the most powerful instruments that companies can use to pursue business benefits related to respecting human rights in general, and gender equality in particular.

HRDD is about respecting the human rights of all stakeholders across the entire supply chain. It is an ongoing process of defining policies, mitigating risks, monitoring compliance, communicating outcomes, and remedying any violations that may, unfortunately, still happen.

The concept of HRDD was introduced by the UNGPs on Business and Human Rights. The OECD Guidelines for Multinational Enterprises (MNEs) extended the Principles to other areas of responsible business conduct, such as environment and climate change, conflict, labour rights, bribery and corruption, disclosure, and consumer interests. Similarly, the International Labour Organisation (ILO) has adopted a [tripartite MNE Declaration](#), containing principles for multinational enterprises and social policy.

An HRDD process allows businesses and their suppliers to gain a complete and fact-based picture of actual and potential human rights opportunities, as well as risks and their negative impacts in their operations. It enables them to examine the root causes of these risks, and develop measures to mitigate them. The process culminates with action plans at the level of an individual business, as well as jointly, that will place the business(es) on the path to human rights-responsive business conduct.

"NO COUNTRY CAN EVER TRULY FLOURISH IF IT STIFLES THE POTENTIAL OF ITS WOMEN AND DEPRIVES ITSELF OF THE CONTRIBUTIONS OF HALF ITS CITIZENS."

MICHELLE OBAMA, SPEAKING AT THE SUMMIT OF THE MANDELA WASHINGTON FELLOWSHIP FOR YOUNG AFRICAN LEADERS IN 2014

1 LGBTIQ+ stands for: L – lesbian; G – gay; B – bisexual; T – trans; I – intersex; Q – queer; A – asexual, agender, aromantic; and + – other diverse sexual orientations and gender identities.

2 [Clingendael and Partnering for Social Impact 2020](#) (commissioned by CNV Internationaal); OECD COVID-19 and Responsible Business Conduct.

### Adding a gender lens to human rights due diligence

However, it is important to recognise that employees working for international brands and their suppliers, are not a homogenous group. In addition to representing diverse socio-cultural settings, they hold diverse gender identities and sexual orientations.

Amidst such diversity, women are often among the most disadvantaged, and discriminated against, in recruitment, training and career opportunities. They are more likely to be paid less than men for doing the same job. They are also more often subjected to precarious, informal or irregular employment, and particularly vulnerable to harassment in the workplace. While exercising human rights due diligence, therefore, it is imperative that businesses adopt a “gender lens” to take these diverse identities into account.

The [OECD](#) calls for businesses to recognise the “different risks that may be faced by women and men” and “be aware of gender issues and women’s human rights in situations where women may be disproportionately impacted.” In other words, companies should exercise **Gender-responsive Human Rights Due Diligence (GR-HRDD)**.

In practice, a GR-HRDD perspective entails recognising that business processes affect rights holders with different gender identities in different ways. The GR-HRDD process identifies and integrates solutions to encourage equality amongst men, women, and other gender identities, so they can all reap the same social and economic benefits ([Geneva Academy 2018](#)). It therefore covers a much broader spectrum than pursuing the rights of women and girls alone.

But what does gender identity mean?

Gender identity refers to “a person’s deeply felt, internal and individual experience of gender, which may or may not correspond to the person’s physiology or designated sex at birth.”<sup>3</sup> Sex refers to the characteristics that are biologically and physiological determined. Gender norms and inequalities have historically resulted in a hierarchical distribution of power and rights that, in most contexts, favours men. It also disadvantages women, and people with non-binary gender identities, such as transgender and intersex persons.<sup>4</sup>

Gender identity affects all aspects of an individual’s life experience, including legal, economic, social and cultural aspects. Gender discrimination is largely invisible at first sight, and may not come to light in standard human rights risk assessments, or due diligence processes. Moreover, each gender identity or sub-group is impacted differently by discrimination, societal norms and values, power imbalances, and other culturally defined roles.

Adopting a gender lens enhances our understanding of how different groups are impacted by unequal access to, or enjoyment of rights, opportunities, resources, and responsibilities. Addressing this power imbalance is an integral element in addressing human rights and social justice. It is also a precondition for, and indicator of, sustainable people-centred development for both businesses as well as governments.<sup>5</sup>

Notwithstanding, this GR-HRDD tool recognises that women constitute the majority of employees who face gender-specific risks, discrimination and inequality. The underlying analysis, as well as the bulk of case studies and recommendations, are therefore focused on women. The choice for a women-focused HRDD tool also takes into account that gathering (useful) gender-disaggregated information for men and women is already a complex undertaking. This complexity increases once you incorporate the full gender spectrum in your analysis.

3 [WHO: Gender and health](#)

4 CEDAW Committee, General Recommendation no 28 (2010), UN doc CEDAW/C/GC/28, para 5.

5 The UN Working Group addressing human rights within transnational corporations and other business enterprises noted in its 2019 report, titled ‘[Gender dimensions of the Guiding Principles on Business and Human Rights](#),’ that rights holders are not a homogenous group. Men and women are further stratified by race, ethnicity, disability, sexual orientation, and gender identity, and these factors also intersect with income, geographic location and migratory status. In order to respect and address human rights issues in the form of laws, regulations, policies, plans, practices and decisions, therefore, measures to implement the UN Guiding Principles must be responsive to differences among rights holders.

We do acknowledge, however, that other gender identities often face comparable risks. When exercising GR-HRDD, therefore, it is highly recommended that companies make efforts to understand the specific risks faced by, as well as interests of, different gender identities.

## 1.2 WHY IS THIS GR-HRDD TOOL NEEDED?

In the past few years, a number of tools<sup>6</sup> have been developed to help companies to incorporate human rights principles – and gender equality in particular – in their operations. However, many of them focus on specific elements of HRDD, such as the underlying theory, or specific areas of practice. In addition, there are different international policy guidelines and multilateral treaties that companies need to comply with.

The first objective of the GR-HRDD tool is to provide an **overarching rationale, or business case**, as well as recommendations for including gender considerations in your business practices.

The second objective is to create a single integrated tool for **effectively dealing with all the steps in a HRDD process, while adding gender responsiveness into this mix**. In general terms, the (GR-)HRDD cycle consists of six steps (based on the OECD Guidelines, UN Guiding Principles on Business and Human Rights):

1. defining policies
2. identifying risks
3. mitigating risks
4. monitoring compliancy and progress
5. communicating outcomes, and
6. remedying violations

Integrating a gender lens into HRDD processes means analysing the differentiated impacts of business activities on different gender identities. It covers actual, as well as potential impacts on women's rights that a business enterprise may cause or contribute to, or that may be directly linked to its operations, products, and services, as well as its business relationships.<sup>7</sup> These underlying causes could include some prevailing economic, social, political, or cultural beliefs.

Addressing gender-specific impacts in relation to businesses and human rights also requires recognising that the underlying dynamics may contribute to complex cultural biases, and gendered power imbalances within your company, and broader supply chain. It further entails acknowledging your company's relationship to, and impact on, such deeply-rooted gender dynamics.

While one company cannot single-handedly change the broader social context, it does have a responsibility to acknowledge, and analyse these situations. You are also responsible for ensuring that you are not perpetuating, and/or benefiting from existing gendered inequalities.

<sup>6</sup> Examples of such tools include: [“Doing Business with Respect for Human Rights: A Guidance Tool for Companies”](#), [OECD Due Diligence Guidance For Responsible Business Conduct](#), [IDH Gender Toolkit](#), [Human rights impact assessment guidance and toolbox](#)

<sup>7</sup> UN Working Group on Business and Human Rights (2019) Gender Dimensions of the Guiding Principles.

### 1.3 WHO IS THIS TOOL INTENDED FOR?

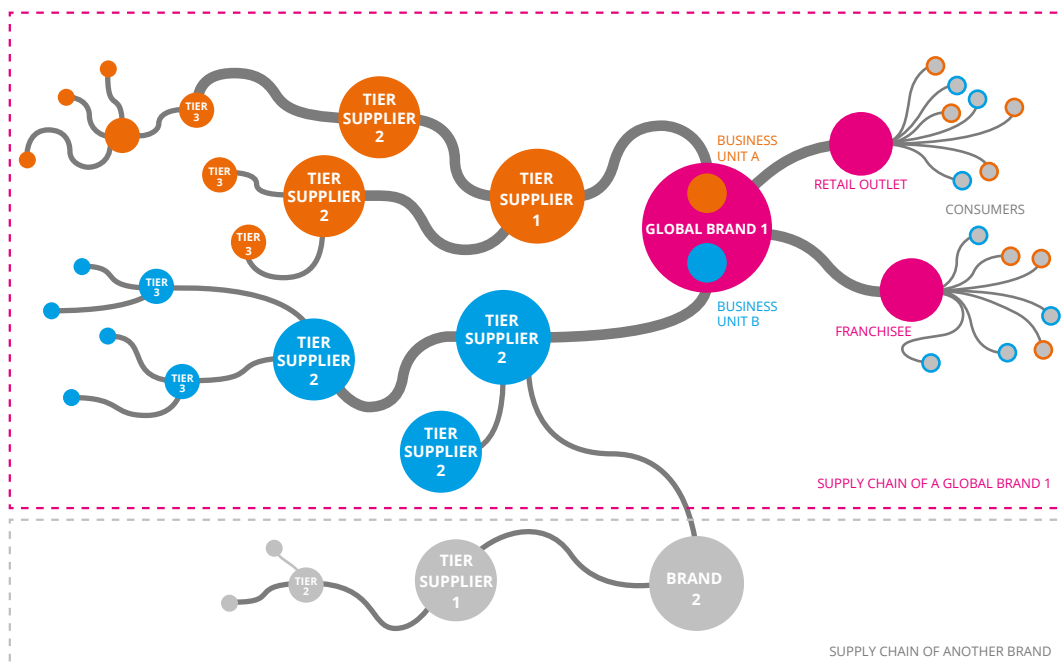
Before we go any further, let us first provide clarity who this tool is intended for, by first giving the different definitions we will use in the remainder of this GR-HRDD tool.

A **'company'** (sometimes referred to as a 'business' or 'enterprise'), is defined as a single legal commercial entity (which may or may not have other legal entities as business units or subsidiaries under its umbrella).

A company can be a **'global brand'** or **'multinational enterprise (MNE)'** that produces, markets, and/or sells a portfolio of products and/or services to consumers in different parts of the world (frequently through diverse business units or subsidiaries). Examples of global brands include Unilever, H&M and TUI. A company can be based in a **single country, while sourcing internationally.**

It is very difficult for companies to operate in isolation. Most often they are part of a (global) **'supply chain'** consisting of many different companies who sell their products and/or services to other companies. We refer to these companies as **'suppliers'**. These are in turn grouped into different categories. A **Tier 1 Supplier** sells directly to another company that in turn sells to consumers. But a supplier can also be a **Tier 2 Supplier** who sells to Tier 1 Suppliers, or a Tier 3 contracted by Tier 2. Most suppliers do not work exclusively for one brand but sell to many different global brands. All of this is illustrated in the picture below.

#### Visualising global supply chains



All companies have an obligation to exercise human rights due diligence, and to employ a gender lens (GR-HRDD) in doing so. However, the GR-HRDD process may vary considerably across companies. Some of the factors influencing the operationalisation of GR-HRDD include the size of the company, the nature of products sold, or the position of the company in a supply chain.

This tool is primarily designed for MNEs, and their internationally-dispersed suppliers. It also offers relevant insights for small- and medium-sized enterprises (SMEs). So, when we refer to "company", we refer to MNEs and suppliers, since each should do its utmost to achieve gender equality (by applying GR-HRDD), ideally in a collaborative spirit.

In assembling this toolkit, we have taken into account that the needs, as well as operational realities of different private companies differ greatly. There is, therefore, no one-size-fits-all GR-HRDD approach. A medium-sized company with a handful of staff will likely have limited capacities, as well as resources, to comply with GR-HRDD. Conversely, a small start-up, may have the advantage of starting with a clean slate, ensuring that gender equality is embedded in its business strategy, policies and operational activities. A large multinational with in-house staff focusing exclusively on corporate social responsibility may have the resources to deal with GR-HRDD. However, it is also more likely to be subjected to complex political dynamics, and its internal procedures, large workforce, and other operational challenges, may hamper its ability to change.

The tool also takes into account that companies are at different stages of human rights due diligence. Some may be completely new to such approaches, while others may already be working on some, or all elements of GR-HRDD.

The GR-HRDD tool can also serve different needs within a company. It may be beneficial for executives who want to showcase their company's human rights credentials to shareholders, but also for staff involved in day-to-day due diligence activities, such as those working in procurement or legal affairs. In a word, this tool can benefit all who are responsible for "gender responsiveness." It will help you gain a better understanding of what this means, why and how it benefits stakeholders, how it adds value to your company, and how to exercise GR-HRDD in practice.

Using the results of your analysis, you can identify where action is needed in order to achieve gender equality by applying the GR-HRDD approach. This could be in the form of incremental steps, such as: strengthening your gender policies to inform more practical interventions; "piloting" a GR-HRDD approach within one specific product category, and its associated suppliers; and then building on the lessons learned to expand to your other product categories and supply chains. Another incremental approach could be to start in one or two production locations in a country, consider other locations within the country, and then add more countries.

Your company will benefit most from this tool if you use it as an integral part of your overall policy and strategy development, and align it to your day-to-day operations. This also means that we strongly recommend using it together with internal and external stakeholders from corporate headquarters, business units, local subsidiaries, workers' councils, suppliers, local communities, and so on.

## 1.4 HOW TO USE THIS TOOL

### Practical instruments

As highlighted above, this GR-HRDD tool (including the accompanying cases in part 2 and the workbook in part 3) is organised in such a way that users can quickly navigate to the instruments they consider to be most relevant to their needs. Some readers may be interested in finding a business case that resonates with their own dilemmas in dealing with gender issues. One company may want to understand how they are contributing to the gender-related Sustainable Development Goals (SDGs), while another may be in search of practical guidance on how to address GR-HRDD in their internal audit processes.

Whatever your starting point, the instruments contained in this tool can help you deal with some frequently encountered GR-HRDD questions, and dilemmas. They can also provide some support in addressing the human rights issues facing your internal, as well as external, stakeholders.

We highly recommend that you conduct a separate GR-HRDD process for each company within your supply chain: namely the global brand, as well as your Tier 1 and 2 suppliers. This means that each company should implement every one of the six steps, from defining a gender equality policy, right through to remedying any human rights violations. If, as a (global) brand, you would like to stimulate your suppliers to contribute to your gender equality policy, it is helpful to support them to conduct their own GR-HRDD. You can also communicate your expectations on due diligence by translating your own policy into Supplier Codes of Conduct. By stimulating them to do their own GR-HRDD, you enable them to increase their productivity, quality, and innovativeness.

The next table explains how various questions you might have regarding GR-HRDD are being addressed in this tool.

QUESTIONS FROM STAKEHOLDERS	INSTRUMENT PROVIDED	WHERE TO FIND IT
A Why is a GR-HRDD tool needed, who should use it, and how can it be applied?	Introductory section outlining the <b>core reasons</b> to pay attention to gender equality and gender-specific human right risks. This chapter also describes for <b>who</b> the tool is intended, and <b>how</b> it can be used.	Chapter 1
B Why should you care? What is the business case for investing in GR-HRDD, and what tangible benefits can you realise from pursuing gender equality, and respecting gender-specific human rights?	Elements of the <b>gender equality business case</b> to illustrate how companies can improve both their bottom-line, and their corporate social responsibility, by respecting (gender-specific) human rights.	Chapter 2 paragraph 2.1
C How does gender equality relate to your efforts related to the 2030 Agenda for Sustainable Development?	Explanation of how striving for gender equality helps you to contribute to the 2030 Agenda and related <b>17 Sustainable Development Goals (SDGs)</b> .	Chapter 2 paragraph 2.2
D How is the GR-HRDD organised? What are the major steps you have to take, and what labour principles should you consider to eliminate gender-specific human rights risks?	Explanation of the <b>6 steps of GR-HRDD</b> (based on the OECD guidelines) and the <b>9 human rights principles</b> that have to be addressed to eliminate gender-specific human rights risks.	Chapter 3
E How can you identify the level of GR-HRDD compliance of your company, either in its entirety, or for specific business units or geographical operations?	An easy-to-use <b>GR-HRDD maturity assessment</b> helps you to quickly pinpoint steps in your GR-HRDD approach that may require immediate attention.	Chapter 4 <b>Workbook</b> 
F What do you need to do in each of the six steps of GR-HRDD?	<b>An overview of each step, as well as practical insights</b> and exercises for conducting each of the six steps in GR-HRDD.	Chapter 5
G How can you assess and improve your current GR-HRDD processes?	<b>Checklists to assess</b> your current GR-HRDD processes, and identify points for improvement.	<b>Workbook</b> 
H How can you implement the GR-HRDD tool in its entirety?	<b>Ready-to-use templates to:</b> <ul style="list-style-type: none"> <li>• formulate your policy</li> <li>• assess your gender specific risks</li> <li>• identify mitigating measures</li> <li>• identify Key Performance Indicators (KPIs) to monitor progress design your monitoring approach</li> <li>• formulate your communication strategy, and</li> <li>• design your grievance and remediation approach</li> </ul>	<b>Workbook</b> 
I What can you learn from the experiences and practices of other companies in your sector, or even from other sectors?	<b>Case study summaries</b> from the Cocoa, Ready-Made Garments, and Tourism & Hospitality sectors.	Applying GR-HRDD in practice
J How can you raise awareness regarding the “why” of GR-HRDD amongst your executives, managers, staff and suppliers?	A <b>quiz</b> that you can use to start a dialogue within your company about gender-based human rights.	<b>Quiz</b> 
K Are there any other interesting and helpful third-party resources that we can also use in our GR-HRDD process?	<b>A list of resources</b> to help you further explore helpful guidance that you can use in your GR-HRDD process.	<b>Helpful resources</b>

### Timeline and resource requirements

During the process of preparing this tool, one frequently-asked question by interviewees from diverse companies was: “How much time and resources does it take to improve our GR-HRDD approach?” While it is tempting to attempt a simple answer, the truth is we cannot. In reality, the scale of many global brands requires managing complex value chains, with goods sourced from numerous countries, and sold in even more markets. It is therefore not only a difficult undertaking, but it may not be advisable to attempt to conduct continuous GR-HRDD assessments for all entities that are linked to your products or operations.

We have therefore developed a template for conducting GR-HRDD maturity assessments to help you identify your level of compliance for each step of the due diligence process. These assessments can be applied at different levels, such as for the company as a whole, or for different sub-brands, business units, or product categories. Through this preliminary analysis, you can then identify which steps require the most urgent attention. As explained above, you can also stimulate, and facilitate your Tier 1 and 2 Suppliers to conduct a GR-HRDD maturity assessment.

Using the results of your maturity assessment (and those of your suppliers), you can identify where action is needed in order to comply with GR-HRDD. Once you embark on the actual due diligence process, we recommend a phased approach. You can start by targeting the most serious risk categories, or locations, processes, or activities that require the closest attention. Another approach could be to assess where you are best able to apply your influence to mitigate or remediate issues, where they occur. We also recommend that you make efforts that extend your positive impact by cooperating with your business partners and suppliers. This can further enhance your ability to identify, and address both potential as well as actual human rights risks across your entire value chain.

## 1.5 WHICH SOURCES WERE USED TO DEVELOP THIS TOOL, AND HOW WILL IT EVOLVE OVER TIME?

### Sources

The GR-HRDD tool is based on insights gathered through interviews with 12 companies across different sectors. It also builds on private sector engagement initiatives undertaken by the GAA over the last few years (covering the RMG, banking, food, tourism, and metallurgic sectors).

In addition, we have perused and analysed a large variety of sources including:

- Key intergovernmental guidelines (including from the UN, OECD, and ILO)
- Information from gender-focused organisations, NGOs and trade unions (such as Plan International, Fair Wear, Women Win, BSR, and UN Women)
- Existing HRDD tools (such as those developed by the Danish Institute for Human Rights, OECD, UN and Shift)
- Reporting standards and requirements (e.g. the Global Reporting Initiative, and the UNGP Reporting Framework)
- Industry benchmarks (e.g. Equileap, Bloomberg, and the Fashion Transparency Index)
- Publicly available information from company websites, such as:
  - T&H sector: TUI, Better Places, Accor, Marriott, 3Sisters Adventure Trekking, Tenzing Travel
  - Agrifood sector (cocoa): Mars, Nestlé, Mondelez, World Cocoa Foundation, Divine Chocolate, International Cocoa Initiative
  - RMG sector: Kering, Suitsupply, H&M, Levi Strauss & Co, Lindex, GAP, Adidas

### A living tool

We consider this tool to be a “living tool.” The concept of GR-HRDD is still in its infancy, which means there is still a lot to learn, not only by companies, but also other relevant stakeholders. By gathering, and sharing new in-depth understandings and examples from practice along the supply chains, we can further strengthen future GR-HRDD approaches.

As GAA lead, [Plan International Netherlands](#) has aligned efforts with Women Win, who are developing an online platform that will integrate the content of this tool. We encourage

companies to start to use the tool, and explore its functionality in all its dimensions. As they do so, we also hope that they share their own business cases, as well as insights gained on the relevance, and usability of the instruments, as well as their learnings from practice. This information will be invaluable in continuously updating, and improving the tool.

Chapter 6 reiterates the value of exercising GR-HRDD, and concludes with a 'Call for Action.' It outlines some practical questions that will help us to collectively gather learnings and insights to support further improvements of this tool. The chapter also reminds us of our joint responsibility to contribute to a world where all have equal opportunities, and where disproportionately negative impacts on women are prevented and/ or mitigated.

We invite as many companies as possible to join our journey towards making human rights due diligence processes gender proof!





## 2 MAKING BUSINESS SENSE OF GENDER EQUALITY

In this chapter, we explore two compelling reasons why it makes sense for companies to invest in gender equality, and to exercise GR-HRDD. We start with a brief overview of the (very clear) business case for respecting gender-specific human rights. The next section describes how striving for gender equality also helps businesses to contribute to the 17 SDGs.

### 2.1 THE BUSINESS CASE FOR INVESTING IN GENDER EQUALITY

Numerous empirical studies underscore the business case for gender diversity. Synthesising some findings from a number of such studies, these benefits include:

(1) higher profitability and productivity; (2) increased ability to attract and retain talent; (3) greater creativity, innovation and openness; (4) enhanced reputation; and (5) the ability to better gauge consumer interest and demand. (ILO 2019, [Women in Business and Management: The business case for change](#)).

These business benefits are among some of the most potent reasons and motivators for companies to strive to achieve gender equality. A sixth trigger for companies is that there is a significant (inter)national drive towards gender-sensitive business practice, coupled with a mounting body of regulations that businesses have to comply with.

The business case for gender equality holds true for both (global) Business to Consumer (B2C) companies, and their Business to Business (B2B) **suppliers**, many of whom have supply relationships with multiple B2C companies. By increasing their productivity, quality, and innovativeness, B2B suppliers can significantly strengthen their competitive position and performance, and serve their customers better.

Women play a crucial role across the entire business supply chain, as one, or more of the following actors: small-scale entrepreneurs in the informal or the formal sector; self-employed seamstresses; farm labourers; distributors and retailers; factory workers; administrative staff; supervisors and high-level managers; business owners; or consumers buying from global brands. The business case applies to women in all kinds of roles, all over the globe.

That investing in gender equality pays off for all types and sizes of companies around the world, has been shown in several studies conducted by, among others, the Boston Consulting Group (BCG), McKinsey, ILO, the UN High-Level Panel (UNHLP) on Women's Economic Empowerment, and the International Finance Corporation (IFC).

#### Why investing in gender equality makes business sense.

All enterprises stand to benefit from:

- 1 Increased business productivity, profitability and stability
- 2 Increased ability to attract and retain talent and reduced costs by lower employee turnover
- 3 Greater creativity, innovation and openness



- 4 Strengthened company brand and reputation
- 5 The ability to better gauge consumer interest and demand
- 6 Compliance with regulations

"THE BUSINESS CASE FOR GENDER EQUALITY IS COMPELLING. INVESTING IN WOMEN IS INDEED SMART ECONOMICS."

PHILIPPE LE HOUÉROU, EXECUTIVE VICE PRESIDENT AND CEO, INTERNATIONAL FINANCE CORPORATION

We discuss the six benefit areas in more detail below.

### 1. Increased business productivity, profitability and stability

[McKinsey](#) found out that gender-diverse companies are 15% more likely to outperform the national industry median. Research by [BCG](#) shows that companies that reported above-average diversity on their management teams also reported innovation revenue that was 19 percentage points higher than that of companies with below-average leadership diversity. This translates into 45% of total revenue, versus just 26%, respectively.

Not surprisingly, gender-diverse organisations also reported better overall financial performance. Their EBIT (earnings before interest and tax) margins, for example, were around 9 percentage points higher than those of companies with below-average diversity on their management teams.

## SODEXO

[Sodexo](#) is a French food services and facilities management company with more than 400,000 employees (2019), and a presence in 80 countries.

Gender equality is a core principle for Sodexo, demonstrated by its global aspirational targets. These include a commitment to ensuring that all employees work in gender-balanced teams (where women account for between 40-60% of staff), and that the representation of women in senior leadership positions reaches 43% in UK and Ireland by 2025 (currently 36%).

The importance of gender equality is supported by Sodexo's own [global study in 2018](#), which highlighted that gender-balanced management teams were more effective across several areas and specifically demonstrated improved performance in terms of profit, employee engagement, health and safety and client retention. Sodexo has been recognised several times as one of The Times Top 50 Employers for Women in 2020.

[The ILO \(2019\)](#) similarly found significant benefits for companies pursuing gender equality. Nearly three-quarters of surveyed enterprises cited an improved bottom line, with a profit increase of between 5% and 20%. Globally, the majority of enterprises (29.1%) reported profit increases ranging between 10% and 15%.

According to the 2016 UNHLP report on Women's Economic Empowerment, every additional woman in senior management, or at corporate board level, is associated with a higher return on investments. Companies with gender-diverse boards also consistently outperform companies with male-dominated management teams in terms of share price performance during times of crisis and volatility.

The ILO/IFC Better Work Programme has found that improving working conditions is also closely linked with employer profitability. In Cambodian factories, improvements in working conditions led to a significant decrease of in-line product rejections, by an estimated 39% directly benefiting the companies bottom-line profitability.

In other studies, conducted in Bangladesh and Egypt, the IFC found that offering work-based healthcare for female staff and their children is linked to a three- to four-fold return on investment.

Implementing gender-sensitive commitments and practices in the supply chain also makes good business sense. It is estimated that giving women the same access to agricultural resources as men could raise production on women-managed farms in developing countries by around 20 to 30% ([UN Women](#)).

## KYAGALANYI

There is a growing demand for sustainably-produced coffee globally, in particular for “coffee with a story.” This, in addition to the higher value of certified coffee, led Ugandan coffee company, Kyagalanyi, to increasingly focus on sourcing high-quality coffee.

As an important cash crop, coffee is traditionally considered a “man’s crop,” with women working alongside their husbands. Since men retain the bulk of coffee income, women have little motivation to improve coffee production.

In 2013, Kyagalanyi, participated in the gender trajectory of the Dutch-based civil society network, AgriProFocus. The main aim was to improve how the company reflects gender equality values in its staff and operations.

Some activities in the trajectory included: developing a gender policy; increasing the representation of female staff; building gender equality values and skills of the company and staff; building capacities of female coffee producers; and promoting gender-balanced collaboration, decision making and financial management at the household level.

As a result, the company has seen a significant rise in its RoI. Yields increased fast (50-70% in 5-8 years), quality improved, and more female staff came on board (rising from 3% to 24% in four years), and creating a more diverse company with a broader range of talents.

The company’s gender “journey” is explained in [this factsheet](#) that demonstrates the value of respecting gender-specific human rights in Uganda’s coffee value chain.

A 2018 study by Nordea, the largest financial group in Northern Europe, found that among the 100 blue chip Nordic companies, those with the most gender-diverse management experienced 40% lower volatility in return on capital employed. Companies with more gender-diverse boards of directors also report significantly lower volatility in returns, which is key for value creation.

The opposite scenario also holds true. Court cases related to gender-related harassment and violence, and associated punitive measures such as fines and compensation orders, can divert and drain an enterprise’s budget and lead to higher insurance premiums. If cases are lost or settlements arranged, there can be major direct financial implications, with an impact on the company’s profitability.

## 2. Increased ability to attract and retain talent, and reduced costs from lower employee turnover

Workforce capabilities and employee retention are key to an enterprise’s success. In addition to the costly process of finding, and attracting skilled people, many companies struggle to hold on to productive employees. Additionally, businesses need to identify specific factors that affect the retention of female staff, and draw up initiatives to attract new female talent. These are among some prerequisites for providing an inclusive business culture that encourages staff of all genders to stay.

By contrast, companies that are committed to ensuring a safe, inclusive and happy workplace for women employees tend to have higher staff loyalty, more motivated employees, fewer workplace conflicts and tensions, decreased absenteeism and staff turnover, and a higher quality of work. [The business case for change \(ILO, 2019\)](#) discusses the experience of Nalt Enterprise, a Vietnamese garment manufacturer. Among other benefits, the company saw its staff turnover fall by one-third following the establishment of a women’s clinic, and day-care for employees’ children. In Papua New Guinea, the [IFC](#) estimated that, on average, staff losses due to gender-based violence amounted to 11 workdays per year.

The 2019 ILO [Women in Business Report](#) surveyed 13.000 enterprises in 70 countries. Nearly 57% of respondents indicated it was easier to attract and retain talent with inclusive (gender) policies. Companies also highlighted other positive results from dealing with workplace violence and harassment, including increased productivity of not only survivors of such abuses, but also former perpetrators and by-standers.

Unfortunately, many companies fall short of creating such an inclusive culture. Moreover, many women experience various forms of harassment, or suffer from various work-related hardships, including accidents, or unsafe and unhygienic working conditions, all of which contribute to increased incidences of illness, absenteeism, disability, or even death. This in turn affects the company's bottom line due to high employee turnover and loss of talent, and high costs for compensation packages, as well as recruiting new staff. Companies also experience diverse Indirect costs that may include decreased staff functionality and performance, and poorer quality of work.

### 3. Greater creativity, innovation and openness

A safe and decent working place, with more diversity, and more women in leadership positions, also has a positive business impact. It contributes to greater openness and creativity in the workplace, and nurtures innovation and knowledge building. In general, gender diversity across organisations and value chains contributes to better business performance, as women offer new perspectives, ideas and skills. It has been shown to generate new product ideas and process improvements, and to attract and retains new talent.

Research from [McKinsey](#) and [BCG](#) shows that companies with workforces and leadership teams that are balanced between men and women are more creative, innovative, and resilient. Female staff of such companies tend to have higher levels of engagement and ambition. More diverse companies are also better able to win top talent, and improve their customer orientation, employee satisfaction, and decision making. All this leads to a virtuous cycle of increasing returns. An [IMF study](#) also shows that in industries with greater demand for higher creativity and critical thinking that is associated with diverse work teams, such as in the high-tech and knowledge-intensive sectors, there is a positive association between gender diversity in senior positions and financial performance.

### 4. Strengthened company brand and reputation

More than ever before, the actions of companies and their supply chains are under increased public scrutiny. Customers, employees, shareholders, governments, employer representatives, unions, and NGOs, expect businesses to respect (gender-specific) human rights, and adhere to responsible codes of conduct. Compliance with these guidelines and regulations will help you to effectively deal with such scrutiny. There is also a clear, and ever closer correlation between gender equality and company reputation.

Moreover, businesses today are increasingly challenged to engage in credible and coherent communication about their gender responsiveness, not only with regard to their workforce, but also among consumers and other stakeholders.

A poor public image, for example due to serious violation of labour rights in the workplace, influences consumers' buying habits, and erodes a company's relationship with other stakeholders. Bad publicity also has negative consequences for business continuity, and contributes to difficulties in recruiting and retaining staff.

### 5. The ability to better gauge consumer interest and demand

Women control the majority of global consumer spending, currently estimated at US\$29 trillion, and expected to rise to US\$40 trillion by 2018.

Gender-disaggregated marketing strategies, as well as tailored products and services, can help to access and maintain a loyal female customer base. It can also open up new markets. The [ILO Business case for change \(2019\) report](#) noted that 36.5% of companies with gender diversity initiatives, were better able to gauge consumer interest and demand.

[McKinsey](#) research has, furthermore, found that diversity management helps to strengthen customer orientation. Women and minority groups are key consumer decision makers. The report notes that by committing to diversity as a strategic imperative, "companies align their own organisation more closely with an increasingly heterogeneous customer base." The study links this improved customer relationships in two respects: reaching key purchasing decision makers and taking a customer perspective, and concludes that "... A top team that reflects these powerful demographic groups will have a better understanding of their market decision behaviour and how to impact."

## 6. Comply with regulations

As a company, you are required to comply with an ever-growing body of (inter)nationally endorsed business practices, as well as legislation that seeks to safeguard (gender-specific) human rights. Among such requirements, think of the voluntary international gender-related commitments and frameworks, as well as diverse international, and national laws.

The most prevalent global framework is the '[UN Guiding Principles on Business and Human Rights](#)' (UNGPs).<sup>8</sup> These were developed through worldwide consultations with representatives of diverse stakeholders, and endorsed by governments in 2011. The UNGPs draw on three core pillars – “protect, respect, remedy” – that are collectively referred to as the Ruggie framework. The UNGPs acknowledge that while states are obligated to respect, protect and fulfil human rights and fundamental freedoms of all people (1<sup>st</sup> pillar), business enterprises are required to respect human rights, and remedy any violations (2<sup>nd</sup> and 3<sup>rd</sup> pillar).

Accordingly, businesses should avoid infringing on the human rights of others, and should address any adverse human rights impacts associated with their operations. To facilitate quick action, the Principles also call on business enterprises to establish, or participate in, effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.

An example of a legally binding international regulation is the ILO's Convention 190, which addresses violence and harassment of workers. On 21 June 2019, governments, employers, and trade unions agreed on an international standard for ending violence and harassment in the world of work. The new Convention, and its accompanying Recommendation 206, was subsequently adopted by the ILO, affirming everyone's right to a safe workplace, free of violence and harassment. The message is clear: No one should be subjected to any kind of violence or harassment while doing their job.

At the national level, there are many different guidelines that regulate labour conditions and human rights, such as the Anti-Slavery Act in the UK, mandatory HRDD requirements for large companies in France, and the recently-announced mandatory child labour due diligence in the Netherlands.

In the Netherlands, private companies and their associations, together with unions, government bodies, and NGOs, have incorporated these hard and soft laws into guidelines and covenants for 'International Responsible Business Conduct' (IRBC). The objective is to ensure adherence with the ever-growing number of legal requirements, and by doing so minimise companies' legal and financial risks. For example, advice issued by the [Social Economic Council](#) of the Netherlands in September 2020 calls on businesses to pay attention to existing due diligence legislation, and be prepared for upcoming new legislation. To this end, the Council encourages greater cooperation at the sector level, and notes the need for EU-wide legislation on mandatory due diligence for companies.

Companies can also expect ever-stricter human rights requirements governing capital markets. This not only applies to accessing different forms of financing, but also to your eligibility to participate in joint trade missions with your government. Such governance mechanisms are also increasingly applying a gender lens, with particular attention to gender equality and/or women's empowerment.

<sup>8</sup> Key elements of the UNGPs have been adopted by other major international and national standard-setting bodies, including the OECD Guidelines for MNEs, and ISO 26000. At a later stage, additional guidelines were introduced, covering specific topics, such as gender.

## 2.2 STRIVING FOR GENDER EQUALITY HELPS YOU TO CONTRIBUTE TO THE 17 SDGS

The 2030 Agenda for Sustainable Development (2030 Agenda) comprises a set of 17 Sustainable Development Goals (SDGs), which are global development priorities adopted by almost 200 UN member states in September 2015. The 2030 Agenda pays particular attention to human rights, recognises gender equality as a cross-cutting goal, and underscores the importance of leaving no one behind. The SDGs provide an opportunity for actors across the public, civil society, and private sector spectrum to work together towards a more sustainable and inclusive world, while also positively impacting the lives of girls and women.

Gender is a stand-alone goal (SDG 5) that calls for gender equality and empowerment of all women and girls. The role of gender equality in meeting diverse other 2030 Agenda targets is also recognised in several SDGs, most notably 8 (Decent work and economic growth), 10 (Reduced inequalities), and 17 (Partnerships for the goals).

By exercising GR-HRDD, companies are able to identify the most important gender risks within their operations and value chains. Linking your policies and risk mitigation measures to the SDGs helps you to simultaneously contribute to gender equality and the SDGs and thus maximising positive outcomes for society as a whole.

To put it another way: by investing in any of the other 16 SDGs, you can simultaneously contribute to gender equality, as described below.

# GIRLS ADVOCACY ALLIANCE

## HOW A GENDER LENS CONTRIBUTES TO ACHIEVING THE SDGS



By providing living wages, facilitating equitable access to economic resources for women, and working more with female entrepreneurs, your company helps women to earn more. This not only helps to reduce poverty, but translates into company benefits, such as reduced staff turn-over, sick leave, and enhanced productivity and bottom line.



By providing women with a secure source of income, and building their skills and confidence, companies can contribute to women's efforts to have more autonomy over their lives, including through enhanced access to, and control over productive resources and services (such as land, livestock, water, energy, or finance.) This in turn enhances women's productivity and purchasing power, which can help lift more people out of hunger.



By raising awareness about health & sanitation, providing appropriate health care and sanitary facilities to women on the job, and reducing violence, harassment and abuse, your company helps to improve the overall health and wellbeing of women. Such actions also simultaneously reduce sick leave and staff turn-over, and increase productivity.



By ensuring equal and adequate levels of training to men and women, as well as strengthening women's competencies, your company helps to enhance access to, as well as inclusiveness of skilled staff. This helps to improve living standards and wellbeing, while simultaneously raising your company's productivity, quality, and innovativeness.



By increasing the representation and participation of women in decision-making processes, you contribute to improved access to education and training, decent labour participation for women, and a decrease in gender-based violence. Removing gender-based discriminatory policies and practices has positive effects on labour productivity, economic development, and human capital formation.



By ensuring the availability of safe and affordable drinking water, as well as good quality sanitation, at community level, as well as in the workplace, your company helps to improve the health and wellbeing of women and children, as well as their families. This leads to a virtuous cycle of human capital accumulation, labour productivity improvement, and economic growth.



By using affordable, clean and sustainable energy in your operations, and by engaging women in the use, development and distribution of this type of energy, your company positively impacts the future livelihood of women, while reducing the negative climate impact of your business operations.



By providing decent jobs and living wages, ensuring equal job and training opportunities for men and women at all hierarchical levels, banning forced labour, protecting labour rights, and promoting safe working environment for women, your company helps to increase access to decent work opportunities and increased income levels. This contributes to sustainable economic growth, while and improving business performance and financial returns.



## HOW A GENDER LENS CONTRIBUTES TO ACHIEVING THE SDGs



By building resilient infrastructure, promoting inclusive and sustainable industrialisation, and fostering innovation, you can contribute to increased employment, as well as inclusive access to jobs for all genders. This also promotes improved access to resources, and overall economic growth.



By creating, and enforcing policies and practices aimed at non-discrimination in recruitment, training and careers, and payment of fair wages, you reduce inequalities between men and women.



When considering establishing a mine, farm, factory, warehouse or office, a company can demand that governments provide for sustainable housing, parks, infrastructure and transportation that fits the needs of all gender identities. This contributes towards more inclusive, safe, resilient, and sustainable cities and human settlements.



By listening better to, and respecting the “voice of women,” (who have a higher inclination to recycle, save energy, and reduce waste) in buying & consumption decisions, and by stimulating gender-equal access to and governance of natural resources, property and technologies, companies can facilitate their own switch to more sustainable consumption and production.



By applying, and leveraging women’s unique local knowledge, skills and experiences regarding management of food, water and natural resources, in companies’ own business operations, and by working more with female entrepreneurs, companies can fast-track climate change mitigation and adaptation, as well as disaster risk reduction.



By applying, and leveraging women’s unique local knowledge, skills and experiences regarding management of marine resources, fisheries, aquaculture and tourism, in companies’ own business operations, and by working more with female entrepreneurs, companies can better help conserve the oceans and seas, reduce marine pollution, and sustainably manage coastal ecosystems.



By applying and leveraging women’s unique local knowledge, skills and experiences regarding indigenous practices for land stewardship, companies can help preserve natural ecosystems, regenerate forests, and share the benefits natural resources in a more equitable way.



By actively addressing gender-based violence, child labour and trafficking with various mechanisms (including zero-tolerance policies, grievance procedures and relevant programming), companies help to promote peaceful, just and inclusive societies, and improve overall household and community welfare.



By partnering with governments, civil society organisations (including women’s organisations), the media, academic institutions, leading campaigns and joining key initiatives, and by jointly implementing gender-sensitive policies, companies can help reshape social attitudes, shift biased mind sets, reduce gender stereotyping, and end discriminatory practices.

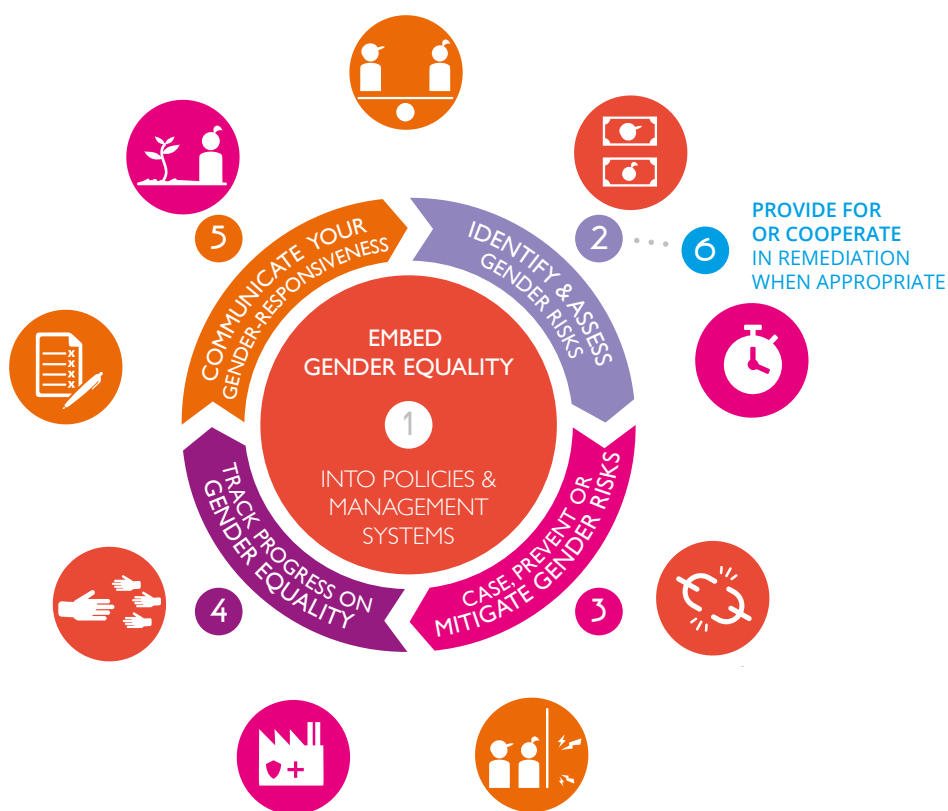


### 3 GENDER-RESPONSIVE HUMAN RIGHTS DUE DILIGENCE

To support you in exercising GR-HRDD, we provide you with a tangible and practical tool that will be beneficial for years to come. This guidance is based on theory, as well as on real experiences of companies and their stakeholders, in diverse and complex situations.

This guidance is intended to equip you with practical advice, as well as useful assessment questions and insights to help you get started, or build on existing efforts to respect gender equality throughout your operations.

To address gender-specific human rights impacts, businesses need to recognise the complex underlying gender norms that contribute to cultural biases, and power imbalances on the work floor, and in supply chains. There is also a need to acknowledge how companies contribute to, or impact such gender dynamics. While a company cannot change such contexts on its own, it does have a responsibility to acknowledge and analyse these situations and ensure that it is not perpetuating or benefiting from pre-existing gendered inequalities. GR-HRDD processes should therefore cover both actual and potential impacts on women's rights that a business enterprise may cause, or contribute to. This includes exploring how such impacts may be linked (directly or indirectly) to its operations, products or services by its business relationships.<sup>9</sup>



<sup>9</sup> UN Working Group on Business and Human Rights (2019) Gender Dimensions of the Guiding Principles.

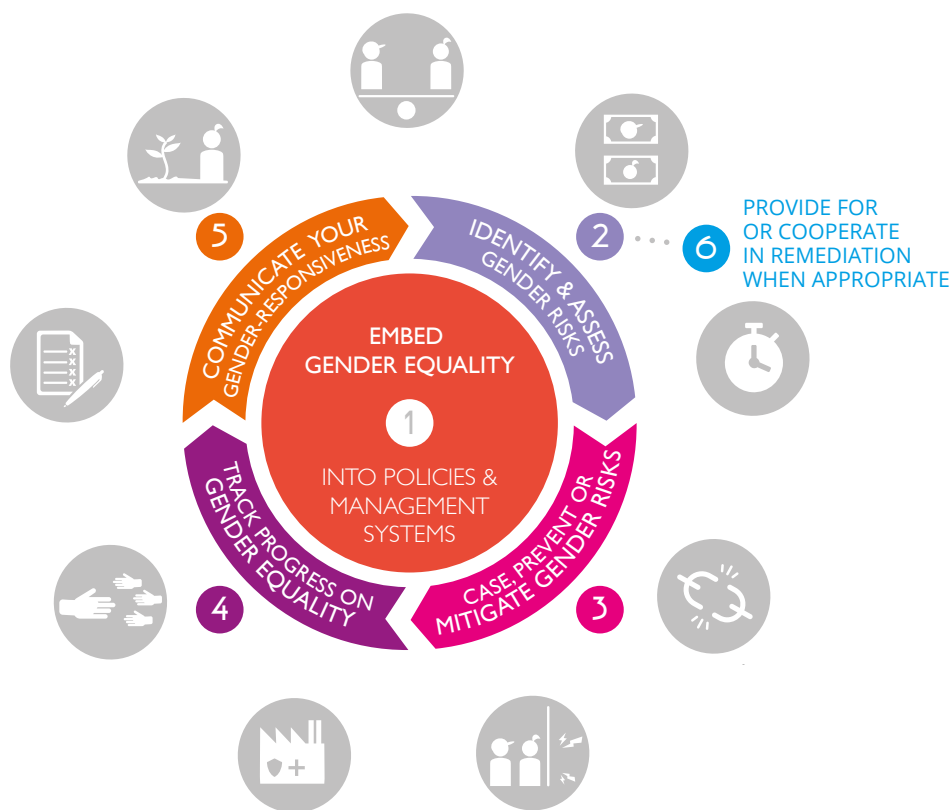
The GR-HRDD tool combines two components:

- **The six steps** of a gender-specific HRDD approach;
- **The nine human rights principles**, with a focus on gender-based inequalities, and their impact on women.

The GR-HRDD tool helps you to embed the nine human rights principles within each of the six GR-HRDD steps. For example, as you define gender-specific policies (Step 1 of your GR-HRDD), you will tailor your policy to each of these nine labour right principles (e.g. by explicitly referring to these in your Code of Conduct). Similarly, in the second step, you will identify some gender-related risks related to the nine principles, and assess their specific impact on female workers. This process is repeated for the final four steps as well.

### 3.1 THE SIX STEPS OF GR-HRDD

This GR-HRDD tool follows the six steps of the OECD Due Diligence Guidelines, as shown in the diagram on the next page.



Below we briefly explain what each of these steps entail and how each is adapted to a GR-HRDD process.



#### STEP 1: EMBED GENDER EQUALITY INTO POLICIES & MANAGEMENT SYSTEMS

This step entails developing, designing, and evaluating gender-sensitive, and gender-responsive policies and plans. The aim is to mitigate, and address, real and potential adverse impacts identified in your company, as well as its subsidiaries and suppliers. The outcome of this process provides you with a policy framework for, among others, respecting gender equality, reaping the associated business benefits, and complying with (inter)national human rights laws and regulations.



## STEP 2: IDENTIFY & ASSESS GENDER RISKS & ADVERSE IMPACTS

In this step, you will assess your company's (or a specific business unit's) potential to be gender responsive. It will take you through some gender-related human rights risks in your operations, processes, products, and services over their full life cycle. It also involves setting priorities for actions to mitigate any such risks.



## STEP 3: CEASE, PREVENT OR MITIGATE GENDER RISKS

Once you are aware of (potential) negative gender impacts, your company should adapt its operational policies, processes, and budget allocation to cease, prevent, or mitigate the adverse impacts of not being sufficiently gender responsive, and to tap gender-related opportunities that can help you improve your business performance.



## STEP 4: TRACK PROGRESS ON GENDER EQUALITY

To ensure compliance with, and continuous improvement of your gender-specific human rights policies, practices and instruments, you will need a transparent mechanism for monitoring, tracking, evaluating and learning in order to continuously improve. This is also critical in ensuring good relationships with your stakeholders.



## STEP 5: COMMUNICATE YOUR GENDER-RESPONSIVENESS

It is important for your company to communicate with all its stakeholders (staff, suppliers, shareholders, consumers, etc.) that it respects gender equality, and conducts business in a responsible and sustainable way. Being open about your activities and results also demonstrates accountability.



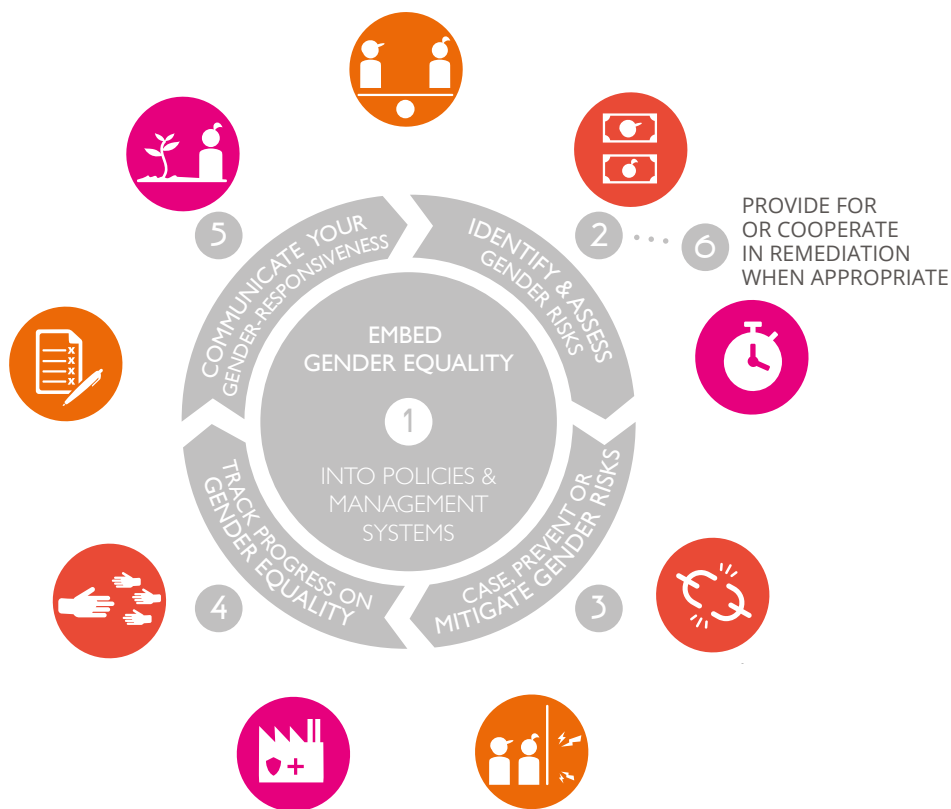
## STEP 6: PROVIDE FOR, OR COOPERATE IN REMEDIATION WHEN APPROPRIATE

The final step is to put in place a grievance mechanism to alert your company to deviations from relevant (gender-related) human rights standards. It also supports you to identify risks, as well as procedures for effective and gender-responsive remediation for human rights abuses. You should ensure that right holders know of, and can freely access all available judicial and other remedies. It must be noted, however, that these mechanisms cannot replace judicial mechanisms, or other state-instituted complaint procedures.

### 3.2 THE NINE HUMAN RIGHTS PRINCIPLES TO BE ADDRESSED IN GR-HRDD

Many human rights fall under the sphere of influence of companies. For this reason, the following chapters elaborate on how GR-HRDD intersects with nine human right principles. These nine human rights principles provide you with a reference point for examining your gender-related business and employment practices. They are based on the principles that are most commonly referred to in labour standards, by certification bodies, etc. (see the Helpful Resources section for an overview of how some selected organisations work with these principles).

Your company might already be working on one or more of these principles. In the Dutch IRBC agreements, for example, a significant number of companies have expressed their interest to work on salient risks as freedom of association, living wages, and child labour in their businesses and supply chains. Companies might argue that gender equality is not a "priority," as they need to focus on these more "salient risks." Such a viewpoint disregards the reality that gender inequalities are often embedded within these risks. Hence applying a gender lens from the start of your HRDD process, or including this lens while working on already prioritised risks, can actually contribute to a win-win solution!



Below we describe each of these labour right principles, and outline how to apply a gender lens to each principle in your business practice, and in particular in your GR-HRDD.



## A WORKERS FACE NO DISCRIMINATION IN RECRUITMENT, EMPLOYMENT AND TRAINING

### Background of this principle.

Discrimination in recruitment, employment and training refers to practices that have the effect of barring certain groups from participating fully and equally in the labour market, or that place such groups in a vulnerable position. This can be based on one, or a combination of factors, including race, colour, religion, sex, political opinion, sexual orientation, disability, age, HIV/AIDS status, and social position (marital status for example). Discrimination can be direct or indirect (hidden) in nature.

### Why is a gender lens relevant?

In general, women workers face more discrimination in the labour market than men. Hence, they do not have equal opportunities in terms of recruitment, access to training, job prospects, promotion, termination, or retirement.

This is exacerbated if they get married or pregnant or if they already have children. Employment contracts are often terminated when women become pregnant. To avoid this, women sometimes conceal their pregnancy. This may create a number of health issues for them and the baby, for example due to working long hours, or continuing to perform heavy manual labour that may be hazardous in their condition. In some cases (such as for migrant workers) women are subjected to mandatory pregnancy testing. This can take place prior to securing employment, or be used as a condition for continued employment.

Women may also face a range of other gender-related human rights issues, such as being denied a job following maternity leave, or being reassigned to lower-paid jobs. Women are also confronted with vertical, as well as horizontal occupational gender segregation. They typically occupy fewer senior positions, with the bulk of female staff employed in traditionally low-paying sectors.

Women are often denied access to training opportunities that can help advance their professional development. This can be due to stereotypes about what women can or cannot do, or at a more practical level, because training schedules may conflict with their unpaid care responsibilities. This further affects the extent to which women are represented in supervisory or leadership levels.



## B WORKERS RECEIVE, AND HAVE CONTROL OVER FAIR WAGES & BENEFITS AT A LIVING WAGE LEVEL

### Background of this principle.

Internationally-agreed labour standards call for all workers to receive fair and comparable wages, hours, and benefits, for comparable work. These standards also stipulate that the provision of wages, overtime pay, benefits, and paid leave, should meet or exceed the legal minimum and/or industry benchmarks, or be in accordance with collective agreements. Policies for the calculation of basic wages, overtime, bonuses, and payroll deductions should be the same for both men and women workers, and measures should be taken to ensure that all personnel understand these policies.

A salary should, ideally, cover the basic subsistence needs of a worker, and his or her family. This is called a “living wage.” A living wage allows for workers to pay for basic household needs such as adequate food, housing, health care, child-care, education, clothing and transport, with a provision for unexpected events. The concept of a living wage means that all these basic needs should be provided for in a worker’s net take-home pay package, excluding overtime. In many countries, the difference between a living wage estimate and the legal minimum wage is quite significant.

### Why is a gender lens relevant?

Women workers outnumber men in the lowest-paid positions of most global supply chains. Since women often earn less than men for carrying out the same tasks, this adds to the (already) significant gender gap in wage and benefits. On average, female employees earn 24% less than men for the same work or work of equal value. They also receive fewer bonuses, and are more likely to be paid by the hour, or per piece, meaning they end up working longer hours for less pay. Women are also prone to (illegal) deductions of salaries and benefits when they are pregnant or sick. No country has, so far, achieved full gender parity in pay.

Many companies deny maternity leave benefits, or these may be insufficient to cater for women’s needs. This may force them to quit their job. Since most countries do not recognise paternity benefits, ensuring that women get their due benefits is all the more important.

One final issue that is often overlooked is that women do not always have full agency over the income that they earn, or control over (their own) financial resources more generally. Salaries for workers in lower-level positions are often disbursed in cash, which is risky for both employers and employees. For employers, this includes a higher risk of theft, fraud during disbursement, and bookkeeping challenges. For workers, cash payments mean time lost waiting in line to receive payment, and the risks that come with carrying large amounts of cash. Women also face added pressures from other family members on how money is saved or spent.



## C WORKERS WORK REASONABLE HOURS WITH DECENT CONDITIONS

### Background of this principle.

Companies should ensure that their working hours comply with national laws, industry benchmarks, or relevant international standards, whichever affords greater protection to ensure the health, safety and welfare of workers. The standard number of allowable working hours in a week is 48, excluding overtime. While some overtime is allowed, it should be voluntary, not exceed twelve hours per week, recorded accurately, paid out in full, and not be requested on a regular basis. Refusal to do overtime cannot be punished, retaliated against, or penalised in any way.

**Why is a gender lens relevant?**

Many female workers, especially those on low wages, are happy to work overtime because they can earn some extra money for their families. However, overtime is hard to control, and managers are often under pressure to meet delivery targets, so they may pass on unrealistic daily targets to employees, and/or request workers to work extra hours. As they often occupy the lowest position and status, women bear the brunt of these unrealistic targets. Furthermore, overtime is not always recorded, which makes women even more vulnerable to exploitation, such as being denied their entitlements for the extra work done. Moreover, pregnant women may be denied their right to work overtime, hence affecting their ability to maintain a decent living standard. And finally, women often face additional safety risks when working overtime, or in irregular hours, for example when they are required to go back home late in the evening.

**D WORKERS FREELY CHOOSE THEIR WORK, AND ARE NOT FORCED, BONDED, OR OBLIGATED TO WORK****Background of this principle.**

All work must be conducted on a voluntary basis, and not under threat of any penalty or sanctions. The legally binding [ILO protocol](#) on forced labour clearly states that the use of forced or compulsory labour (including bonded and indentured labour) in all its forms is prohibited. Forced labour is a criminal act. Child labour is a violation of fundamental human rights and has been shown to hinder children's development, potentially leading to lifelong physical or psychological damage. Children have a right to be protected from harm, as well as to education, and should attend school before they start working.

**Why is a gender lens relevant?**

Unfortunately, forced labour and labour trafficking appears in many forms. These include modern slavery, human trafficking, child labour, changing the conditions of employment from those stipulated in contracts, confiscating and holding personal identification documents, confinement and restricting workers' freedom of movement, threatening physical force, withholding wages, or requiring workers to make deposits and/or financial guarantees. The least protected persons, in particular women and youth, indigenous and tribal peoples, and migrant workers, are more likely to face these risks. It is unacceptable for businesses to employ children in conditions of child labour. To analyse its root causes a gender lens is key to define the right measures to mitigate..

**E WORKERS ARE NOT HARASSED OR ABUSED****Background of this principle.**

Workers should be treated with respect and dignity. All forms of violence and harassment in the workplace, including verbal, physical, sexual, or psychological bullying, (sexual) harassment, or abuse, must be prohibited.

**Why is a gender lens relevant?**

Even though workplace violence has negative consequences for all parties involved, women face more violence, harassment and abuse than men. These acts can be of a physical, psychological and sexual nature that embarrasses, humiliates, intimidates, annoys and/or alarms people. They include unwelcome sexual advances, unwanted hugs and touches, suggestive or lewd remarks, requests for sexual favours, or patting. In its more severe form, such abuse can involve hitting and slapping, or even rape. Gender-based violence also includes the display of indecent, derogatory, or pornographic pictures, posters, drawings, or videos.

Most victims of interpersonal violence are women. LGBTIQ+ are also particularly vulnerable to sexual harassment, derogatory statements and homophobia, along with general religious and cultural prejudices. These groups are especially vulnerable to harassment when they fail to meet production targets, make a mistake, ask for leave, arrive late, fall sick, or travel to and from work. Due to the social stigma attached, victims often keep silent to avoid risking their reputation, damaging their marriage prospects, upsetting their partner, or losing their job. Even if they want to voice their complaints, there often is a lack of safe and independent reporting mechanisms.





## F THE WORK ENVIRONMENT IS SAFE & HEALTHY, AND WORKERS HAVE ACCESS TO BASIC NEEDS & SERVICES

### Background of this principle.

A safe and hygienic working environment is crucial for the wellbeing of your employees and for your company's productivity.

This covers the availability, accessibility, acceptability and quality of healthcare facilities, including sexual and reproductive health. It also includes clean toilet facilities, safe drinking water, and sanitary facilities for food preparation and storage. Other health dimensions involve maintaining proper facilities and safety measures (bearing in mind the prevailing knowledge of the industry and of any specific hazards). The principle states that adequate steps shall be taken to prevent accidents and injury by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Workers (including new or reassigned workers) should also receive regular and recorded health and safety training. And finally, accommodation, where provided, must be clean, safe, and meet the basic needs of the workers.

### Why is a gender lens relevant?

Women face gender-specific health impacts from inadequate health facilities in the workplace. They include urinary tract infections, poor menstrual hygiene, and adverse effects of toxic substances (such as chemicals) for women who are pregnant or breast-feeding. Other health consequences are linked to sexual harassment and gender-based violence (such as unwanted pregnancy), and a related lack of access to reproductive health, and counselling services.



## G FREEDOM OF ASSOCIATION & THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

### Background of this principle.

The right to organise is a fundamental human right. Every individual, without distinction, has the right to collective bargaining over employment conditions (such as salary and remuneration, working hours, rest periods and benefits) through trade unions and/or workers' councils. This principle states that employers should adopt an open attitude towards the activities of trade unions. Moreover, workers' representatives should not be discriminated against, and should be able to freely carry out their representative functions in the workplace. Workers in most countries face many barriers to organising themselves. In the first place, it can be very risky to join a trade union. Secondly, workers may be unaware of their rights, let alone how to defend them.

### Why is a gender lens relevant?

Organised labour is itself often gender biased: (a) women, and other marginalised groups may not be aware of their rights and opportunities; (b) women or LGBTI+ staff are poorly represented at leadership levels in trade unions; (c) representation of women's specific interests (such as maternity leave, child care, health care, daily meals, sanitation facilities) is weak; and (d) women may find it difficult to attend trade union meetings due to conflicts with their other roles as primary caregivers for their families.

If you adopt a gender lens while addressing workers' rights to freedom of association, there is a high chance that you will hear about the issues and risks that women, and other gender minorities, may encounter in the workplace. Unions with adequate female representation can think along with you on how to integrate childcare facilities, clean toilets, hygienic conditions, maternity benefits, anti-violence, and grievance and remediation mechanisms into your company's labour strategies and collective bargaining agreements.



## H WORKERS HAVE A LEGALLY BINDING EMPLOYMENT RELATIONSHIP WITH CLEAR CONTRACTS AND CONDITIONS

### Background of this principle.

All work performed must be on the basis of a recognised employment relationship, established in compliance with national legislation and international labour standards, whichever affords the greater protection. The employment relationship is the legal link between employers and employees through which a person performs work or services under certain conditions in return for remuneration. This relationship also ensures that workers are able to access the rights and benefits associated with employment.

Workers enjoy minimal protection, or none at all, if they are in a flexible employment arrangement, such as “labour-only” contracting, sub-contracting, and home-based working arrangements, as well as apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

### Why is a gender lens relevant?

Women and girls in vulnerable positions (e.g. lower-level jobs) are more prone to exploitation and unfair employment relationships. This is exacerbated if people are employed through a recruitment agency, if workers are expected to be more flexible, and if production is outsourced to smaller, and cheaper suppliers. If women are contracted as home-based workers (which often is the case), they most certainly have no access to any type of job security, benefits, social protection, or health and safety standards, and they often bear most of the operating costs themselves, such as electricity and equipment parts and maintenance.



## I WORKERS HAVE ACCESS TO, USE OF AND CONTROL OVER LAND AND SAFE NATURAL RESOURCES

### Background of this principle.

All men and women should have access and control over natural resources. Companies should ensure that: forests are protected against deforestation and degradation; clean water is available for consumption and irrigation; buffer zones are maintained around protected areas and drinking water sources; illegal and prohibited pesticides and chemicals are not used; and waste disposal does not threaten human health or the environment. Companies should further ensure that infrastructure projects not destroy natural habitats and living environments (villages, farmland, etc.). They should also refrain from monopolising or excessively using both scarce natural resources and human-made resources. And finally, locals should not be illegally and involuntarily displaced from their land to make way for infrastructure, mines, hotels, golf courses, farms, etc.

### Why is a gender lens relevant?

Access to, and control over natural resources, is unequally distributed all over the world, and strongly related to unequal power relationships between men and women.<sup>10</sup> Since women play an important role in subsistence farming, water management, and fishing, the conversion of natural forests into large-scale plantations (e.g. soy and palm oil), and the resulting pollution of rivers and lakes, has a direct impact on women’s livelihoods and therefore on their families and their social position in the community. In many societies, women and girls collect every litre of water for cooking, bathing, cleaning, maintaining health and hygiene, raising small livestock, and growing food. This is often a time-consuming, and sometimes dangerous, chore that may involve spending hours each day burdened by heavy containers, with attendant health consequences. The situation is particularly acute in drought-prone regions, and areas where companies monopolise or pollute the water sources.

<sup>10</sup> [https://www.bothends.org/uploaded\\_files/document/101101\\_gender\\_working\\_paper\\_final.pdf](https://www.bothends.org/uploaded_files/document/101101_gender_working_paper_final.pdf)

### 3.3 READY TO GET STARTED?

While the six steps of this GR-HRDD tool are designed to help you undertake a comprehensive GR-HRDD process, it is important to remember that this is an ongoing process, not a one-off audit. Just as society is evolving, so too is your business context. Suppliers come and go. Government regulations become ever more rigorous. New gender-related risks emerge. As you continue to learn and grow, we encourage you to keep revisiting these steps to renew your focus, and ensure that you are on track in your goal of preventing, and addressing negative impacts on gender-related human rights.

In the next Chapter, we introduce a GR-HRDD Maturity Assessment designed to take you through a simple, but systematic process of identifying your level of GR-HRDD maturity. You may also use this together with your most important suppliers, to identify their level of maturity.

Chapter 5, provides information, good practices and suggestions for each of the six GR-HRDD steps, with a link to the nine human rights principles. For each step, we explain “what” this step entails in more detail.





## 4 INITIATING YOUR GR-HRDD PROCESS: THE MATURITY ASSESSMENT

As cliché as it may sound, *“there is no one-size fits all”* for due diligence processes. Each company will draw on its history and operating context, as well as its business ethos, and related policies. For example, you may already have some experience with IRBC, or be practicing “gender-responsive business conduct” to varying extents within your supply chain(s). Each company, or business unit, will therefore have its own level of maturity in exercising GR-HRDD, both within the company, and its broader supply chain.

### 4.1 GOALS OF A GR-HRDD MATURITY ASSESSMENT

The GR-HRDD Maturity Assessment (MA) tool is designed to take you through a systematic process of identifying your level of GR-HRDD maturity, as well as that of your most important suppliers. Organised along a gender continuum, the MA process will result in an insightful GR-HRDD Maturity Model for your company. The model helps you determine if, and how well, you are currently identifying and addressing gender and women’s human rights issues. It also provides valuable insights to help you further scope, focus, and develop an in-depth plan for achieving a higher level of GR-HRDD maturity.

The scope and focus of a maturity assessment can vary. You may apply it for the company as a whole, or, depending on the level of diversification of your business portfolio, focus it on a specific business unit or product category. For example, if you are a multinational involved in extraction, processing, and supply of diverse commodities (e.g. cocoa and palm oil; mica and zinc; pepper and vanilla), it may be wise to scope the MA to a limited number of business units, product categories, or geographical regions. Depending on your chosen entry point, you may want to identify, and engage with, a broader range of stakeholders in carrying out the assessment.

You can also request, and provide facilitation for, your Tier 1 and 2 suppliers to conduct a maturity assessment.

### 4.2 FOUR MATURITY LEVELS OF GR-HRDD

The MA tool is structured around four levels of maturity – gender unaware, gender neutral, gender sensitive, and gender transformative:

#### Gender unaware

If you are ‘gender unaware,’ gender differences are neither acknowledged nor understood. On the whole, your company ignores the different roles, responsibilities, capabilities, needs and priorities of women and men. Ultimately, you run the risk of reinforcing gender inequality and harm to women in your own company and your supply chains.

#### Gender neutral

The next level up is ‘gender neutral’. The company is aware of gender differences, but these differences and their root causes are not fully understood and not actively addressed in the six steps of GR-HRDD. You assume that you do not have to pay specific attention to these differences and that achieving gender equality is not needed.

#### Gender sensitive

The third maturity level is ‘gender sensitive.’ Gender differences are acknowledged and mostly understood. You also actively address them in the six steps of GR-HRDD. Your company seeks to do no harm, to contribute to improving women’s existing roles in and benefits from value chains, and you aim for gender equality. However, you do not focus on changing core beliefs, values and norms related to gender differences as underlying root causes of gender inequality.

### Gender transformative

The highest, most advanced maturity level you can achieve is 'gender transformative.' Gender differences are acknowledged and understood. You actively address them in the six steps of GR-HRDD. The company explicitly promotes gender equality and women's empowerment, and actively seeks to challenge and change core beliefs, values and norms to root out the causes of gender inequality that prevent women from fully participating in and benefiting from economic activities.

These four maturity levels are depicted in the figure below.

UNAWARE	NEUTRAL	SENSITIVE	TRANSFORMATIVE
<ul style="list-style-type: none"> <li>Executives, managers, staff &amp; suppliers are UNAWARE about gender equality &amp; risks</li> <li>EXECUTIVES are NOT COMMITTED to achieve gender equality</li> <li>Gender equality issues NOT COVERED IN POLICY</li> <li>NO RISKS IDENTIFIED &amp; IMPACTS ASSESSED</li> <li>NO RISK MITIGATING measures are identified and implemented</li> <li>Progress on dealing with risks related to labour principles is NOT MONITORED</li> <li>NO COMMUNICATION to inform all rightsholders &amp; stakeholders</li> <li>NO GRIEVANCE &amp; REMEDIATION mechanism</li> </ul>	<ul style="list-style-type: none"> <li>Executives, managers, staff &amp; suppliers are AWARE about gender differences &amp; risks</li> <li>A FEW EXECUTIVES are COMMITTED to achieve gender equality</li> <li>Human rights issues COVERED IN POLICY &amp; MANAGEMENT SYSTEMS but without a gender lens</li> <li>Human rights RISKS are IDENTIFIED &amp; IMPACTS are ASSESSED without a gender lens and without rights- &amp; stakeholders</li> <li>GENERAL RISK MITIGATING measures are identified and implemented</li> <li>Progress on dealing with risks related to labour principles is MONITORED</li> <li>COMMUNICATE TO INFORM rightsholders &amp; stakeholders about progress on human rights compliance</li> <li>GRIEVANCES are dealt with, few are REMEDIED &amp; wrongdoers are not properly dealt with</li> </ul>	<ul style="list-style-type: none"> <li>Gender differences are ACKNOWLEDGED and MOSTLY UNDERSTOOD by executives, managers, staff &amp; suppliers</li> <li>MOST EXECUTIVES are COMMITTED to achieve gender equality</li> <li>Gender equality issues ADDRESSED IN POLICY, management systems &amp; supplier codes of conduct</li> <li>RISKS are IDENTIFIED &amp; IMPACTS are ASSESSED through a gender lens and with rights- &amp; stakeholders</li> <li>GENDER SPECIFIC RISK MITIGATING measures are identified and implemented</li> <li>Progress on dealing with gender specific risks related to labour principles is MONITORED</li> <li>COMMUNICATE TO ENGAGE all rights- &amp; stakeholders in achieving gender-equality</li> <li>GRIEVANCES are properly dealt with, most are REMEDIED and wrongdoers are properly dealt with</li> </ul>	<ul style="list-style-type: none"> <li>Executives, managers, staff &amp; suppliers ACKNOWLEDGE and FULLY UNDERSTAND gender differences</li> <li>EXECUTIVES are COMMITTED to achieve gender equality and change norms &amp; values that cause inequality</li> <li>Achieving gender equality and changing norms &amp; values that cause inequality are COVERED IN POLICY, management systems &amp; supplier codes of conduct</li> <li>RISKS are IDENTIFIED &amp; IMPACTS are ASSESSED through a gender lens and with rights- &amp; stakeholders</li> <li>GENDER SPECIFIC RISK MITIGATING measures are identified, implemented, regularly assessed and improved</li> <li>Progress on dealing with gender-specific risks is MONITORED &amp; continuously LEARNT from to improve</li> <li>COMMUNICATE TO ENGAGE AND CHANGE NORMS &amp; VALUES all rights- &amp; stakeholders in achieving gender-equality</li> <li>GRIEVANCES are properly dealt with and REMEDIED, wrongdoers are properly dealt with, and lessons are learned</li> </ul>

For each step of the GR-HRDD you can assess your maturity. For example, you may find that you have a very high maturity in one or a few steps, while in the other steps your maturity level is rather low. Or you may have a low maturity level for all six steps.

The MA will also provide you with an average overall score on your maturity. This gives you a general idea of how well you are doing and how far away you are from reaching the highest maturity level.

### 4.3 THE GR-HRDD MATURITY ASSESSMENT TOOL

For each of the six steps of the GR-HRDD process we have defined the characteristics associated with the four levels along the maturity continuum. The resulting GR-HRDD MA Checklist can be found in the accompanying [workbook](#).



There are several options for undertaking your maturity assessment. If your aim is to create awareness, you can work with a small internal working group to collect readily available information through desk research, complemented by a few interviews with a few stakeholders (e.g. male and female managers and workers, representatives of labour unions and workers' councils, counsellors, etc.) to get some anecdotal qualitative insights.

If you aim to accurately scope a full-fledged GR-HRDD approach across your whole company, you should involve working groups for each of your business units, analyse readily available information, gather additional insights through interviews and surveys. These findings can be further validated on the ground through short and targeted scoping trips of e.g. production sites by the GR-HRDD team.

An even more elaborate step is to involve your suppliers in the GR-HRDD maturity assessment to also identify their maturity level and to focus both your own and their future GR-HRDD activities.

Below, we give you an example of the outcomes of a GR-HRDD MA for a fictitious company. It shows that executives, staff, and suppliers are aware of the importance of gender equality. However, few executives are actually committed to achieving gender equality, and the nine labour right principles are not embedded in management systems. Even though a significant number of risks are identified, little additional analysis has been conducted to gauge their impacts, and root causes. Generic risk-mitigating measures have been implemented. The company neither monitors the effectiveness of its gender approach, nor its actual progress towards achieving gender equality. Stakeholders have a vague idea about what the company does regarding gender equality. And finally, grievances are dealt with, but most are not remedied to the satisfaction of the rights holders.

COMPANY NAME		OUTCOMES OF THE GR-HRDD MATURITY ASSESSMENT			
GR-HRDD STEPS	MATURITY SCORE				
	1 = GENDER UNAWARE	2 = GENDER NEUTRAL	3 = GENDER SENSITIVE	4 = GENDER TRANSFORMATIVE	
1 Embed gender equality into policies & management systems	<ul style="list-style-type: none"> <li>Our executives, staff, and suppliers are UNAWARE of the benefits of achieving gender equality and adhering to the 9 human rights principles.</li> <li>None of our executives are committed to achieving gender equality, and adhering to the 9 human rights principles.</li> <li>We have no specific policy related to adhering to the 9 human rights principles.</li> </ul>	<ul style="list-style-type: none"> <li>Some of our executives, staff, and suppliers are somewhat aware of the benefits of achieving gender equality, and adhering to the 9 human rights principles.</li> <li>A few of our executives are committed to achieving gender equality, and adhering to the 9 human rights principles.</li> <li>Adhering to the 9 human rights principles is embedded in policies, and applied through management systems, but without a gender lens.</li> </ul>	<ul style="list-style-type: none"> <li>Gender differences are acknowledged and mostly understood by executives, managers, staff &amp; suppliers.</li> <li>Most of our executives are committed to achieving gender equality, and adhering to the 9 human rights principles, but not bound to achieve this with targets and rewards.</li> <li>Adhering to the gender-specific human rights principles is embedded in policies and supplier codes of conduct, and applied through management systems.</li> </ul>	<ul style="list-style-type: none"> <li>Executives, managers, staff &amp; suppliers acknowledge and fully understand gender differences.</li> <li>Executives are committed to achieve gender equality and change norms &amp; values that cause inequality and bound to achieve this with targets and rewards.</li> <li>Adhering to the gender-specific human rights principles is embedded in policies and supplier codes of conduct, applied through management systems, and both are continuously improved.</li> </ul>	
2 Identify & assess gender-specific human rights risks in operations & suppliers	<ul style="list-style-type: none"> <li>In our own operations risks related to the 9 human rights are not assessed.</li> <li>No impact assessment and root cause analysis are done.</li> </ul>	<ul style="list-style-type: none"> <li>In our own operations all risks related to the 9 human rights are assessed but not through a gender lens and without consulting (potentially) impacted rights holders and gender experts.</li> <li>Impact assessment and root cause analysis is done, but without a gender lens, and without consulting (potentially) impacted rights holders and gender experts.</li> </ul>	<ul style="list-style-type: none"> <li>In our own operations all risks related to the 9 human rights are regularly assessed through a gender lens and by consulting (potentially) impacted rights holders and gender experts.</li> <li>Impact assessment and root cause analysis are mostly done through a gender lens, and by without consulting (potentially) impacted rights holders and gender experts.</li> </ul>	<ul style="list-style-type: none"> <li>In our own operations &amp; those of suppliers all risks related to the 9 human rights are regularly assessed through a gender lens and by consulting (potentially) impacted rights holders and gender experts.</li> <li>Impact assessment and root cause analysis are all done through a gender lens, and by consulting (potentially) impacted rights holders and gender experts.</li> </ul>	
3 Cease, prevent, or mitigate gender-specific human rights risks	<ul style="list-style-type: none"> <li>No mitigating measures related to human rights risks have been identified and implemented.</li> </ul>	<ul style="list-style-type: none"> <li>General mitigating measures related to human rights-related risks have been identified and implemented.</li> </ul>	<ul style="list-style-type: none"> <li>Mitigating measures related to gender-specific human rights risks have been identified and implemented.</li> </ul>	<ul style="list-style-type: none"> <li>Mitigating measures related to gender-specific human rights risks have been identified and implemented, and are regularly assessed and improved.</li> </ul>	
4 Track implementation and results	<ul style="list-style-type: none"> <li>Progress in dealing with risks related to the 9 human rights principles, and achieving gender equality, is neither monitored nor learned from.</li> </ul>	<ul style="list-style-type: none"> <li>Progress in dealing with risks related to the 9 human rights principles is monitored, but not learned from.</li> </ul>	<ul style="list-style-type: none"> <li>Progress in dealing with gender-specific risks related to the 9 human rights principles, and achieving gender equality, is monitored, but not learned from.</li> </ul>	<ul style="list-style-type: none"> <li>Progress in dealing with gender-specific risks related to the 9 human rights principles, and achieving gender equality, is monitored and learned from.</li> </ul>	
5 Communicate how gender equality is achieved, risks are mitigated, and negative impacts prevented	<ul style="list-style-type: none"> <li>No communication related to respecting the 9 human rights principles, and our GR-HRDD approach.</li> </ul>	<ul style="list-style-type: none"> <li>Communication is aimed at informing stakeholders about our progress on human rights compliance.</li> </ul>	<ul style="list-style-type: none"> <li>Communication is aimed at informing and engaging all rights holders &amp; stakeholders in achieving gender-equality.</li> </ul>	<ul style="list-style-type: none"> <li>Communication is aimed at informing and engaging all rights holders &amp; stakeholders in achieving gender-equality, and changing gender norms &amp; values in our value chain.</li> </ul>	
6 Provide for, or cooperate in remediation when appropriate	<ul style="list-style-type: none"> <li>There is no grievance &amp; remediation approach regarding violation of the gender-specific human rights principles, and grievances are not dealt with.</li> </ul>	<ul style="list-style-type: none"> <li>There is a grievance &amp; remediation mechanism regarding violation of the gender-specific human rights. Grievances are dealt with, but few are remedied.</li> </ul>	<ul style="list-style-type: none"> <li>All grievances regarding violation of the gender-specific human rights principles can be voiced, and are received, processed, and properly dealt with. Most are remedied to the satisfaction of rights holders, and wrongdoers are not properly dealt with.</li> </ul>	<ul style="list-style-type: none"> <li>All grievances regarding violation of the gender-specific labour principles can be voiced, and are received, processed and properly dealt with. All are remedied to the full satisfaction of rights holders. Wrongdoers are properly dealt with. Lessons learned are processed into updated gender equality policy and related measures.</li> </ul>	

#### 4.4 APPLYING THE RESULTS OF YOUR MATURITY ASSESSMENT

Once the GR-HRDD Maturity Assessment is completed for (part of) your own company and perhaps even for some of your Tier 1 and 2 suppliers, you can further scope, focus, and develop an in-depth plan for achieving gender equality.

To achieve gender equality, you want to move up to higher levels of maturity for each step of the GR-HRDD. We highly recommend that you strive for a balanced maturity across the six steps. In the case of the example provided our advice would be to strive to get to maturity level 3 for all steps, rather than trying to excel in just one or two areas. This effort might take a couple of years. Once this has been achieved across all steps, the company can then attempt to achieve the highest maturity level (4) for all steps.

We do recognise, however, that this balanced approach takes effort. Rather than attempt to do everything at once, we recommend that you focus first on step 1 and 2 of your GR-HRDD. Once you have fine-tuned your policies, and identified gender specific risks, you will be better able to select the best entry points for tackling the next four steps.





## 5 GENDER-RESPONSIVE HUMAN RIGHTS DUE DILIGENCE

After assessing your “GR-HRDD maturity” (Chapter 4), you are now ready to begin to work on the elements of gender-based human rights that your company may have been previously unaware of, or to make improvements where needed. As explained in previous chapters, to help you identify entry points for action, this chapter takes you on a comprehensive tour of the six steps that make up a GR-HRDD process (see Figure 1) and how to address the 9 human rights principles to substantiate your gender equality ambition.

The six steps of GR-HRDD based on the HRDD approach formulated by the [OECD](#).



Each of the six steps of this GR-HRDD tool is enriched with nuggets of practical advice, good practices and concrete suggestions. We also provide additional insights from businesses that are implementing GR-HRDD. You will also be able to apply this broad range of information, in such a way that it matches your own situation and gender equality ambition. For example, you may just be getting started on the GR-HRDD journey, or you may have achieved a high level of maturity, but need to address remaining blind spots to ensure that you are respecting gender-based human rights across your operations. Or you might be interested in particular in the handy checklist for monitoring your progress.



In the [workbook](#) that accompanies this tool, you will be guided through a detailed set of practical questions for each of the six steps. These questions will help you identify and formulate GR-HRDD specific content, such as policies, gender-related risks, appropriate mitigating measures, targeted KPIs for monitoring, communication instruments, and potential remedies.



For additional insights as you chart your own GR-HRDD process, each step includes an intermezzo with learning experiences from companies in the cocoa, garment, and tourism sectors.

For the sake of clarity, we would briefly like to recap our previous discussion in Chapter 1 on how to structure your GR-HRDD process. We highly recommend that you conduct a GR-HRDD process (including all the six steps) as an individual company, be it a global brand or a Tier 1 or Tier 2 supplier. This means that each company should formulate its own gender equality policy, conducts a risk assessment, defines mitigating measures, tracks progress, communicates about its efforts, and remedies any violations.

If you, as a global brand, want to stimulate your suppliers to contribute to your gender equality policy and reap the associated benefits themselves, we recommend that you (as a global brand) stimulate and facilitate them to conduct their own GR-HRDD. Next, that you translate your own policy into your Supplier Codes of Conduct that your suppliers have to adhere to, and assess how your own marketing and procurement practices potentially enable or hamper your suppliers in their own efforts. By stimulating them to do their own GR-HRDD you enable them to do this with their other clients in mind as well.





## STEP 1: EMBED GENDER EQUALITY INTO YOUR POLICIES & MANAGEMENT SYSTEMS



The first step in your GR-HRDD process is to establish a strong gender-responsive business policy aimed at achieving gender equality with associated management systems to implement the policy and to oversee your compliance. After completing this step, you have firmly set your ambition and formulated a corporate policy that everybody understands, embraces and is committed to.

A gender equality policy should consist of tailored **policy statements for each of the nine human rights principles**. It should explain how your company understands its **own responsibilities within the boundaries of its own operations**, as well as **what you expect of your suppliers with regard to respecting gender-related human rights**. Your policy should set clear expectations, guidance, and management controls for those who are expected to adhere to or implement the policy.

In other words, your gender equality policy should be explicit about what you expect from your employees and management, key suppliers, clients, and other business associates. It should seek to prevent negative impacts, be alert in monitoring operational practices, learn from experience, and improve continuously.

However, it is also good to be aware that there is no **“one-size-fits-all”** solution for addressing gender inequality. Each business entity (be it a global brand or a supplier) will need to assess the specific gender dynamics that are present in its business environment, and develop a gender responsive and integrated policy. Ultimately, the choice of instruments must contribute to positive changes for all workers in the global supply chains.

To help you assess and strengthen an existing gender equality policy or formulate one “from scratch”, this step is organised around the following eight sub-topics.



### 5.1.1 ENSURE COMMITMENT AT THE TOP



A strong commitment to gender equality at the top of your company clearly communicates that your policies matter, and that non-compliance is unacceptable. The tone set by corporate leadership and senior management does much more than influence the actions of lower-level managers and supervisors, employees, and supplier networks. It also ensures that all your stakeholders have a common understanding about the company's standpoint on gender and human rights, and are empowered to take action where necessary.

With help of the Maturity Assessment and the **workbook** of this first step, you have identified your current gender-equality maturity level and you can set your ambition. You can, for example, aim to move just one level up the maturity ladder, or even leapfrog two or three levels up. On its most mature level, your gender equality policy should guide your company to go beyond a "do no harm" (preventing and mitigating) approach. Through a more proactive stance that is focused on transforming gender relations across your business operations, you can make a real contribution to advancing the rights of women, and other disadvantaged groups. This is because a robust gender equality policy must, of necessity, tackle the underlying power structures that contribute to gender-based human rights abuses. Adequate commitment at the top is essential to determine how fast the company must and can move up the GR-HRDD maturity ladder in balance with other corporate priorities and scarce resources.



It is therefore essential that senior management is engaged from the start. A senior management champion can help initiate internal conversations, signal the importance of the process, and ensure the gender policy is strongly embedded in, and complementary to, your company's overall policy, business priorities and management system.

The following boxes provide you with examples of executive commitment and communication.

## PHILIPS

One of the first things we did was ask team members to fill out behavioural 360 questionnaires on their manager's leadership style, which helped us paint a picture both of how each manager intended to behave and how their behaviour actually landed with others.

The consensus was that Philips wanted to be a company that fostered active engagement, free-flowing collaboration and daring innovation – and that getting to that point required the creation of a more diverse and inclusive workplace.

Driven by the belief that achieving gender equality is one of the most effective means of creating an inclusive workplace culture, the promotion of more women to leadership roles was initially prioritised. This strategy has had a hugely positive impact on the company's workplace culture and, by extension, its overall business performance.

But we did not stop there. We decided to take a preventative and proactive approach towards eliminating any unjustifiable gender pay gaps. Research tells us that women typically don't ask for as much money as men upon hiring, which makes it easy to create an instant gender pay gap at recruitment. The company therefore puts in place clear rules around hiring and remuneration, ensuring that there are no gender biases when we bring people into the organisation.

In recognition of the company's efforts to promote equal opportunities for men and women in the workplace, Australia's Workplace Gender Equality Agency has recognised Philips as an 'Employer of Choice for Gender Equality'.

*(Partly based on an interview with Ryan Atkins, Human Resources Director, Philips Australia and New Zealand).*

Source: [Philips](#)

## COMPANY FITS

Company Fits is a Dutch small- and medium-sized enterprise (SME), offering a range of custom-made concepts for occupational clothing. The company is committed to contribute to the SDGs and explicitly refers to SDG 5 in its sustainability report. The company's policy also states that to encourage female employees within its factories, "we prefer suppliers who have a good balance between men and women with a position within the management."

*(Based on the Sustainability report of Company Fits, 2019).*

Source: [Company Fits](#)

## UNILEVER

"We want to help create a world in which every woman and girl can create the kind of life she wishes to lead, unconstrained by harmful norms and stereotypes. We believe a world where women are economically empowered will be a fairer, happier and more prosperous place to live – and that our business will flourish in it. By 2020 we will empower 5 million women."

To achieve its goals, Unilever specifically identifies interventions to challenge harmful norms, advance diversity and inclusion, promote safety for women, enhance women's access to training and skills, enhance life skills and entrepreneurship, and expand opportunities in the retail value chain.

*(Based on Unilever's goal to enhance livelihoods for millions and advance opportunities women).*

Source: [Unilever](#)

### 5.1.2 ENGAGE AND ORGANISE YOUR INTERNAL & EXTERNAL STAKEHOLDERS



You have to make sure that key stakeholders are aware of the importance of gender-equality and that they are engaged and organised to help formulate an inspiring and yet achievable gender-equality ambition and policy.

Similar to other corporate policies, it is thus important to include all your **internal stakeholders** (employers, workers' councils, unions) in a joint effort to understand your company's current and desired gender equality levels, as well as your GR-HRDD maturity levels.

The aim of this joint effort is, among others, to gain insights into the appropriate ambition, which policies (will) work, and to translate the "abstract" language of human rights principles, and gender relations, into everyday business speak. This ensures that a broad cross-section of stakeholders will accept, and adhere to the gender equality policy. It will also help them better understand the policy's relevance to their work, and to contribute to continuous monitoring and learning to improve your business practices with respect to gender equality. Your company will already have various tools at its disposal for communicating with, and engaging key stakeholders. To complement your own instruments, this tool provides you with a quiz full of interesting facts that you can use to kick-start internal discussions about gender. [See the quiz at the end of this tool.](#)



It is particularly important to **engage all staff** who will be expected to directly implement your gender equality policy. This can include managers, specialised staff who manage key business relationships (e.g. procurement and marketing), or functional staff (e.g. human resources, legal, quality managers) who are directly involved in promoting diversity and inclusion, as well as gender equality and women's economic empowerment. A GR-HRDD consultative process offers a valuable opportunity to build a shared understanding of your company's responsibility for safeguarding gender-based rights, as well as creating a sense of ownership among all involved.

For companies with strong links to suppliers, and other actors in the broader value chain, it is also important to ensure that you consult these **external stakeholders** during the policy development process, especially when you also want to translate your gender equality policy into supplier codes of conduct.

Finally, your company may benefit from involving **(inter)national and local NGOs and women's rights organisations** with a good understanding of the gender context in your sector (such as the garment industry, mining, tourism & hospitality, manufacturing, chemicals, or electronics). Such support can provide you with additional insights on the broader socio-economic-political dynamics that influence gender relations in your business context, notably the political climate, relevant laws, and local customs. This information will also help you understand how potential human rights abuses might occur.

Working with civil society actors not only helps you tap their expertise in promoting human rights issues, it can enhance your connections to diverse viewpoints that will further enrich your GR-HRDD process, and enable you to become more accountable to broader society as a whole. However, many companies find it hard to find the right NGOs to engage with. While far from complete, two preliminary overviews of Dutch NGOs – outlined in the **Helpful Resources** section – provide you (especially Dutch companies) with a starting point in your search for GR-HRDD partners.



In order to formalise your relationship with the aforementioned stakeholders, we recommend that you agree on an **organisational form**, both for internal as well as external GR-HRDD processes. Examples of what this could entail include:

- Creating a formally mandated, resourced, and governed GR-HRDD oversight structure/ or programme organisation with a steering committee that includes at least one of the company's executives. Its management team should have strong roots within the company, but should also leverage expertise and allow for critical (but constructive) input from external experts.
- Embedding GR-HRDD within the department responsible for risk and compliance management, with clear links to other departments such as HR, procurement, marketing, and so on.

### 5.1.3 ADHERE TO INTERNATIONAL AND NATIONAL LAW



It goes without saying that your gender equality policy should conform to local and international law.

It is highly recommended that your gender policy (including related operational documents) refers to such national and international legislation to ensure legal compliancy from the outset.

For **international law**, reference can be made to a large number of labour and human rights laws, agreements and conventions, of which the most important are listed in the table below.



### EXAMPLES OF INTERNATIONAL CONVENTIONS ON GENDER-RELATED ISSUES

The international community has a well-defined body of rights and norms established by various United Nations conventions, in particular those under the remit of the International Labour Organization (ILO) treaties and conventions. Examples of international gender equality conventions are:

- ILO Equal Remuneration Convention, 1951 (No. 100)
- Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Workers with Family Responsibilities Convention, 1975 (No. 156)
- Maternity Protection Convention, 2000 (No. 183)
- United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW, UN)
- Eliminating Violence and Harassment in the World of Work (C 190)

International standards referencing these human rights instruments, seek to ensure that all businesses recognise their responsibilities to respect human rights, including those of the most vulnerable. They also distinguish between the specific needs of women, men, and LGBTI+ communities. For more on these international conventions, protocol, see the [Helpful Resources](#) section in the workbook.



While doing your general risk (and impact) assessments at the country level, you will take a deep dive into [local laws](#) that have a bearing on gender-related human rights. For this reason, we strongly recommend that you consult with local lawyers and other local experts (see previous section). You can also seek input from industry associations and other specialised networks in your business sector, as well as diplomatic missions in the country. They will help you gain a better understanding of the local context, and some of the main human rights risks that your company may experience (please refer to Step 2. Section 5.2.1.).

### EXAMPLES OF LOCAL LAWS

In [104 countries](#) there are laws that prevent women from working in specific jobs. This affects the employment choice of 2.7 billion women. For example, a girl in Russia cannot aspire to become a train driver, and Argentinian women cannot distil or sell alcohol. Men can legally prevent their wives from working in 18 countries, including for example Bolivia, Cameroon, Jordan, Niger, Sudan and UAE. Try your hand at [the quiz](#) in the workbook section of this tool to uncover even more strange facts! The following are a few examples of national laws related to gender in the supply chain (you can find more information on the Fair Wear website):

- **Turkey:** According to Article 74 of the Labour Act, pregnant women workers must not be engaged in work for a total period of sixteen weeks, eight weeks before and eight weeks after delivery.
- **China:** China has ratified ILO Convention 100 (equal remuneration), 138 (minimum working age) and 182 (worst forms of child labour), but not Convention 111 (discrimination in employment) or 155 (occupational safety and health). The Chinese Labour Law Article 12 states: "Labourers shall not be discriminated against in employment, regardless of their ethnic community, race, sex, or religious belief." Articles 13 and 14 guarantee equality for women, the disabled, minorities, and demobilised army men.
- **Myanmar:** Maternity leave is provided to women workers for six weeks and a minimum of eight weeks after childbirth. The Factories Act stipulates employers should provide crèches (if there are more than 50 female workers) for children under the age of six, and sets the minimum age for employment at 15 years. The Population Control Healthcare Bill imposes restrictions on 'birth spacing', requiring a 36-month interval between each child. It thus violates the right to privacy and a woman's right to choose when to have children.

Source: [Gender fact sheets Fair Wear](#)



#### 5.1.4 EVALUATE EXISTING POLICIES & MANAGEMENT SYSTEMS



Rather than developing a gender equality policy as yet another new and stand-alone document, it is best to find ways to complement, and fully integrate it into existing policies, such as those used in your marketing, procurement, finance, legal, and HR activities.

You have already defined an overall gender equality ambition and **specific gender-related ambitions for each of the nine human rights principles**, and set a realistic timeframe for achieving them.

Next, we advise you to **assess the extent** to which your existing human rights-related policies are **gender specific enough**. Many companies already make reference to human rights in their **corporate policies**, such as those used in marketing, procurement, health & safety, finance, or communication and PR. You should check to what extent these commitments complement and reinforce your gender equality goals or interfere with it. Others have also signed covenants and other treaties that address human rights. More than 1,200 companies worldwide have subscribed to the Women's Empowerment Principles (WEPs), a set of 7 principles to promote gender equality. In the Netherlands this review can also be done as part of the International Responsible Business Conduct (IRBC) Agreements.

#### 5.1.5 WRITE DOWN YOUR GENDER EQUALITY POLICY STATEMENTS



Your (high-level) commitment on gender equality should be translated into **firm policy statements for each of the nine human rights principles**. These statements can include a target towards achieving gender equality and/or a call to action for tackling gender inequality. They are issued by management, and disseminated amongst your staff, suppliers, and other stakeholders.

At its most basic level, a gender policy entails **replacing gender-insensitive language in existing policies to gender-sensitive language**. Changing the language can be an important first step in making people realise that gender-related differences are real, and raise general awareness on the need to tackle gender inequalities.

At a more advanced level, you should **formulate specific policies to actively achieve gender equality under each principle**. For example, you will have HR policies related to wage and benefits levels. A gender-specific policy might make it explicit that men and women will receive exactly the same level of wages and benefits for the same tasks. Or you may improve your existing recruitment policy by making it explicit that you want to significantly raise the percentage of women at each management level of your company. You may also state that no form of gender-based discrimination during the recruitment process is permitted.

Similarly, you can add a gender dimension to your training policy by mentioning that you provide equal training opportunities during business hours without gender discrimination or intimidation. Your occupational health and safety policies can likewise be strengthened by explaining that you provide for a safe and hygienic working environment that caters to the specific needs of men and women.

Finance is another critical entry point for gender-transformative policies. Corporate tax avoidance deprives governments of much-needed resources that might exacerbate risks posed to women's human rights because of poor (under-funded) social services, understaffed government agencies, and so on. Also, not practising what you preach will harm your brand reputation. While developing your gender-responsive finance policy you should therefore ensure that your tax practices comply with responsible behaviour. This includes reporting publicly about your tax disbursements, paying taxes in the source countries of your business activities where applicable.

It must be stressed that to ensure implementation, your gender equality policy and each of the underlying policy statements must be as **practical** as possible. We also highly recommend that the policy explicitly states that management will be held **accountable for violations** of these policies. It should also clearly spell out what **measures** will be taken in case of violation to communicate that wrongdoers will be dealt with, and prevent a culture of impunity around gender-related human rights abuses.

Through a continuous process of iterative improvements, your company will gradually improve its responsible business practices, including its record on gender equality. In light of the increasing knowledge about risks in the supply chain and the way you mitigate these risks, your policy should be reviewed and adapted on a regular basis.

Examples of policy statements for each of the nine human rights principles are listed in the table below.

EXAMPLES OF POLICIES AIMED AT ACHIEVING GENDER EQUALITY AND RESPECTING GENDER-SPECIFIC HUMAN RIGHTS		
HUMAN RIGHTS PRINCIPLE	INTERNAL RISKS	POLICY STATEMENTS
A Workers face no discrimination in recruitment, employment and training	Discrimination in recruitment & biases in favour of men	<ul style="list-style-type: none"> <li>• We practice inclusive recruitment to help our team grow efficiently, create happier employees, build strong teams, and help our organization beat out our competitors.</li> <li>• We apply a fair and transparent system and process for recruitment, that effectively deals with the “unconscious bias” against women (frequently based on gendered stereotypes and expectations).</li> <li>• We recruit women across all hierarchical levels to help them breach the “glass ceiling” and aim for gender balance by applying minimum targets or quota for the percentage of women across all hierarchical levels.</li> <li>• We recruit women across all job types and aim for gender balance by applying minimum targets or quota for the percentage of women across all job types.</li> <li>• We enable data visibility of gender balance for all hierarchical levels and job types to offer insight and review progress towards our gender goals.</li> <li>• We use our non-discrimination efforts and positive effects on innovation, product quality and productivity in our R&amp;D, marketing &amp; production strategies.</li> <li>• We ensure equal hiring of men and women for both employment and contract work.</li> </ul>
	Limited career opportunities for women	<ul style="list-style-type: none"> <li>• We apply a fair and transparent system and process for managing career opportunities, appointments and promotions.</li> <li>• We roll out unconscious bias awareness training for our managers and their teams to initiate an ongoing dialogue and awareness about bias that leads to team commitments to provide equal career opportunities for women and men.</li> <li>• We prohibit the reduction of salaries, or the limitation or termination of career opportunities due to e.g. pregnancy or maternity leave by an employee.</li> </ul>
	Less training opportunities for women	<ul style="list-style-type: none"> <li>• We provide for equal training opportunities during business hours without gender discrimination or intimidation. This is to ensure that training and professional development opportunities are accessible to all employees so they can empower themselves, and be prepared for the demands of the labour market.</li> <li>• We provide a mentoring framework for women and men to create structure, stimulate new connections and mutual learning to develop and progress diverse talent.</li> </ul>

EXAMPLES OF POLICIES AIMED AT ACHIEVING GENDER EQUALITY AND RESPECTING GENDER-SPECIFIC HUMAN RIGHTS		
HUMAN RIGHTS PRINCIPLE	INTERNAL RISKS	POLICY STATEMENTS
	Less training opportunities for women	<ul style="list-style-type: none"> <li>We provide women's leadership programs and extend them a focus on networking and sponsoring by males and females.</li> </ul>
D Workers receive fair wages and benefits at a living wage level	Wages, overtime pay, benefits and paid leave for women do not meet living wage level	<ul style="list-style-type: none"> <li>Our wages, overtime pay, benefits and paid leave always meet the living wage standard/ the legal minimum/industry benchmarks/collective agreements (whichever is highest).</li> <li>Rather than following a "lowest price strategy," we embrace a fair price strategy that incorporates "true costs" (to reflect, among others, paying decent wages and compensating any environmental damage), and position ourselves as a truly sustainable brand.</li> <li>In order to ensure that women have greater control over their income, we require that they have a personal bank account to safely receive their salary and other payments. If they do not have a personal bank account, we actively support them to open one.</li> </ul>
	Lower wages, overtime pay, benefits and paid leave for women than men	<ul style="list-style-type: none"> <li>We ensure equal pay and benefits between men &amp; women for similar tasks.</li> <li>We do not allow for deductions from wages for disciplinary measures in general and for disciplinary measures that emanate from gender discrimination or gender biases.</li> </ul>
	Women do not have control over income	<ul style="list-style-type: none"> <li>We ensure that all female employees have full and unlimited access to their own bank account into which salaries and benefits are deposited.</li> </ul>
C Employees work reasonable hours at decent conditions	Unrealistic daily targets and overtime too frequently needed	<ul style="list-style-type: none"> <li>We provide as much information as needed (and in a timely manner) on supply volumes and subsequent production targets. This is to minimise unexpectedly fluctuating delivery targets for our suppliers, and their suppliers and sub-contractors.</li> <li>Our business units are not allowed to set piece-rate production targets so high that our own employees or those of our suppliers must work overtime to earn the equivalent of the legal minimum wage.</li> </ul>
	Anyone who refuses to work overtime is punished, retaliated against, or penalised	<ul style="list-style-type: none"> <li>We explicitly forbid our staff and suppliers to punish, retaliate against, or penalise women who refuse to work overtime.</li> </ul>
	Overtime not always recorded and/or not paid for in full	<ul style="list-style-type: none"> <li>Overtime in our company and all of its suppliers is always voluntary, recorded, and fully compensated by at least 150% of regular wages. It must never exceed 12 hours per week (in line with applicable laws and industry standards).</li> </ul>
D Workers freely choose their work, and are not forced, bonded, or obligated to work	Modern slavery & human trafficking	<ul style="list-style-type: none"> <li>We explicitly forbid any kind of modern slavery and human trafficking.</li> <li>None of our employees (including those contracted through labour contractors and recruitment agencies) will ever be required to make a payment to secure a job, such as paying recruitment costs, fees for health checks, etc.</li> </ul>

EXAMPLES OF POLICIES AIMED AT ACHIEVING GENDER EQUALITY AND RESPECTING GENDER-SPECIFIC HUMAN RIGHTS		
HUMAN RIGHTS PRINCIPLE	INTERNAL RISKS	POLICY STATEMENTS
	Confiscation of personal identification documents & withholding wages	<ul style="list-style-type: none"> <li>We explicitly forbid any kind of confiscation of personal identification documents or withholding of wages.</li> <li>We inform all our workers (including those from suppliers) that they may retain their passport and all other documents, and that they cannot be charged fees or required to leave a deposit to ensure their return to the factory if they choose to travel during time off.</li> <li>We pay all wages, including payment for overtime, within legally defined time limits. If no time limits are defined by law, compensation shall be paid at least once a month.</li> </ul>
	Confinement & physical force	<ul style="list-style-type: none"> <li>We explicitly forbid any kind of confinement and physical force.</li> <li>All our workers are free to choose their own housing, or if they choose the housing offered by us or our supplier, they are reasonably free to come and go as they please.</li> <li>We provide employees with alternatives to company-owned housing accommodations.</li> </ul>
<b>E</b> Workers are not harassed or abused	Offensive & sexually-explicit language against women	<ul style="list-style-type: none"> <li>We explicitly forbid all kinds of abuse, harassment, unwanted sexual advances, and use of offensive and sexually-explicit language that physically, psychologically and/or sexually embarrasses, humiliates, intimidates, annoys and/or alarms women.</li> </ul>
	Unwanted sexual advances from male co-workers	<ul style="list-style-type: none"> <li>In working situations with a predominantly female workforce, we use female rather than male overseers and managers.</li> </ul>
	Abuses, threats, intimidation and/or assaults at work	<ul style="list-style-type: none"> <li>We take preventive measures such as safe transportation, safe facilities and safe surroundings for female employees.</li> </ul>
<b>F</b> The work environment is safe and healthy, and workers have access to basic needs and services	Unsafe working environment & poor safety measures	<ul style="list-style-type: none"> <li>We provide a safe &amp; hygienic working environment, including working fire alarms, easily accessible doors and fire escape routes, no dark spaces in and around the building, private and lockable locations for breast feeding, etc.</li> </ul>
	Unhygienic working environment & no separate facilities for women	<ul style="list-style-type: none"> <li>We apply and ensure female-friendly practices in the workplace, including separate toilets for men and women</li> </ul>
	Poor safety training for women and men	<ul style="list-style-type: none"> <li>We provide for mandatory safety trainings for women and men during regular working hours.</li> </ul>
<b>G</b> Freedom of Association and the Right to Collective Bargaining are respected	Lack of awareness of the human right to associate	<ul style="list-style-type: none"> <li>We explicitly communicate with, and provide mandatory training during business hours for managers, suppliers and workers so that they are aware of their right to organise themselves in workers' councils and unions.</li> <li>We encourage and facilitate our suppliers to communicate that they work for us, and that we value and demand freedom of association.</li> </ul>
	Poor representation of women in unions and hindering women from participating in union meetings	<ul style="list-style-type: none"> <li>We stimulate and facilitate trade unions and workers' councils to admit (and actively recruit) women in their leadership and operational teams. We provide them with space to adequately represent gender issues and risks related to all these nine human rights aspects.</li> <li>We do not work with suppliers who do not allow female staff to organise themselves and join trade unions.</li> </ul>

EXAMPLES OF POLICIES AIMED AT ACHIEVING GENDER EQUALITY AND RESPECTING GENDER-SPECIFIC HUMAN RIGHTS		
HUMAN RIGHTS PRINCIPLE	INTERNAL RISKS	POLICY STATEMENTS
	Being threatened, bullied, beaten, or even killed for joining or working for a trade union	<ul style="list-style-type: none"> <li>Any form of threatening or bullying of, or committing violent actions against those who join a trade union or workers' council is explicitly forbidden.</li> <li>We provide space and time for women to exercise their right to freedom of association and facilitate them to be consulted outside the presence of men to express opinions &amp; provide input on business decisions.</li> </ul>
H Workers have a legally binding employment relationship with clear contracts and conditions	Poor job security & protection for women in flexible employment	<ul style="list-style-type: none"> <li>We offer protection and guarantee job security as much as possible for workers in permanent and flexible employment arrangement, such as "labour-only" contracting, sub-contracting, home-working arrangements, as well as apprenticeship schemes.</li> </ul>
	Use of unregistered recruitment agencies	<ul style="list-style-type: none"> <li>We only use certified recruitment agencies who themselves apply gender-responsive policies.</li> </ul>
	Outsourcing to cheaper and informal suppliers	<ul style="list-style-type: none"> <li>We limit outsourcing of production to small and cheap and often informal suppliers, unless these are female-owned companies, and it strengthens their economic empowerment.</li> </ul>
I Workers can own land and have access to safe natural resources	Destruction and pollution of living environments	<ul style="list-style-type: none"> <li>We recognise women as important stakeholders and support them to pursue sustainable economic activities, such as the use of renewable energy sources.</li> </ul>
	Industries that monopolise or excessively use scarce natural and human-made resources	<ul style="list-style-type: none"> <li>We do not monopolise or excessively use scarce natural and human-made resources, and we support women's equal participation in decision making processes that affect their property and access to natural resources (also where they are not the official owner of the resources).</li> </ul>
	Displacement of locals from their land to make way for infrastructure, mines, hotels, golf courses, farms	<ul style="list-style-type: none"> <li>We only construct properties on land that is not claimed, or owned by locals, and apply the right to free, prior, and informed consent of local communities, with participation of men and women. If we do buy land we offer a fair price for it.</li> </ul>

### 5.1.6 CREATE PRACTICAL CODES OF CONDUCT & OPERATIONAL GUIDANCE FOR YOUR SUPPLIERS



To make your gender equality policy work, you can include it in your **Code of Conduct**, as you likely do for other policies.

Such a code of conduct instructs both your own staff and your suppliers about what you expect from them, what they specifically need to do, and how to behave in their daily work.

A code of conduct should specify the standards against which due diligence is to be conducted, refer to clear descriptions and definitions of key terminology (for example 'harassment' or 'living wage'), incorporate existing industry-specific standards (e.g. certification schemes), and link to relevant multi-stakeholder initiatives in which your company participates.

Large enterprises with hundreds, or even thousands of suppliers, often prefer to translate the internally applicable codes of conduct into specific **supplier codes of conduct**. This ensures that guidance for suppliers is aligned to your internal codes of conduct. You also provide your suppliers with concrete suggestions on how to integrate these instructions into existing operational policies, processes, contract templates, IT systems, and so on. SMEs might prefer

to engage their suppliers through one-on-one dialogue to stimulate them to adhere to the company's human rights policies in general, and the gender equality policy in particular.

To leverage your influence in your supply chain, a supplier code of conduct can be used both as a “carrot” and “stick” to ensure compliance across the company's broader sphere of orbit. In other words: comply and you can become our supplier, don't comply and we will help you fix your operations, but if insufficient progress is shown in due course we will terminate our business relationship. Supplier codes of conduct should therefore also make explicit the **responsibilities of up and downstream enterprises in your value chain**, and be added to existing operational policies, procedures and practices to embed them throughout your enterprise.

Supplier codes of conduct can be used by a company to positively influence its first- and second-tier suppliers, and through them ideally the (informal) suppliers further upstream of the value chain. The latter can be enforced if your suppliers formulate their own supplier codes of conducts towards their suppliers further upstream of the value chain.

There are several global standards that help companies to formulate their supplier codes of conduct. A commonly used standard is the Business Social Compliance Initiative (BSCI), nowadays known as [Amfori](#). Another useful report was written by [BSR on Codes of Conduct](#). The table below gives you some practical examples of supplier codes of conduct from different business sectors, where gender is (partly) taken into consideration.

EXAMPLES OF PARTS OF SUPPLIER CODES OF CONDUCT	
HUMAN RIGHTS PRINCIPLE	SUPPLIER CODES OF CONDUCT
<b>A</b> Workers face no discrimination in recruitment, employment and training	<ul style="list-style-type: none"> <li>• <b>Patagonia</b> No person shall be subject to any discrimination in any aspect of the employment, relationship including recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement, on the basis of race, religious belief, color, gender, pregnancy, childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental disability, medical condition, illness, genetic characteristics, family care, marital status, status as a veteran or qualified disabled veteran (in the USA only), caste, socio-economic situation, political opinion, union affiliation, ethnic group, illness any other classification protected under applicable law. All employment decisions must be made based on the principle of equal employment opportunity, and shall include effective mechanisms to protect migrant, temporary or seasonal workers against any form of discrimination.</li> <li>• <b>Nestle</b> Not make use of pregnancy screening or testing at any time before or after the jobseeker signs an employment agreement, except where required by law. In such urgent cases, the results of pregnancy screens or tests must only be used for official purposes in accordance with the law.</li> </ul>
<b>B</b> Workers receive fair wages and benefits at a living wage level	<p>Equal Remuneration:</p> <ul style="list-style-type: none"> <li>• <b>Hunkemöller</b> Business partners observe this principle when they respect the right of the workers to receive fair remuneration that is sufficient to provide them with a decent living for themselves and their families, as well as the social benefits legally granted, without prejudice to the specific expectations set out hereunder.</li> <li>• <b>Mars</b> All legally mandated wages and benefits are provided. Payment is made on time and on at least a monthly basis. Deductions are not taken from pay as punishment. Itemized records are maintained, consistent with this standard, and transparent pay information is provided in a timely manner.</li> </ul>

EXAMPLES OF PARTS OF SUPPLIER CODES OF CONDUCT	
HUMAN RIGHTS PRINCIPLE	SUPPLIER CODES OF CONDUCT
<b>C</b> Workers work reasonable hours at decent conditions	<ul style="list-style-type: none"> <li>• <b>G-Star</b> Suppliers must ensure that regular working hours or overtime do not exceed the legal maximum according to local law or industry standards, whichever affords greater protection. In any event, workers shall not, on a regular basis, be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7-day period on average. While it is understood that overtime is required from time to time in the garment sector, overtime shall be voluntary and based on mutual agreement with workers. In any event, overtime shall not exceed 12 hours per week and shall not be demanded on a regular basis. Suppliers must record all employees' working hours completely and accurately and time records for all workers must be available for review.</li> </ul>
<b>D</b> Workers freely choose their work, and are not forced, bonded, or obligated to work	<ul style="list-style-type: none"> <li>• <b>G-Star</b> G-Star does not tolerate the use of any form of forced labour. Employees are not required to lodge any type of deposits or hand over government-issued identification, passports or work permits as a condition of employment. Employees must be free to leave the factory at all times and the freedom of movement of those who live in employer-controlled residences are not restricted.</li> </ul>
<b>E</b> Workers are not harassed or abused	<ul style="list-style-type: none"> <li>• <b>Nestle</b> Operate with dignity, respect and integrity regarding the treatment of its workers: Any form of psychological, physical, sexual or verbal abuse, intimidation, harassment, or monetary fines or embarrassing acts as a disciplinary measure, is not tolerated.</li> <li>• <b>Mars</b> All forms of abuse or harassment in the workplace is prohibited.</li> </ul>
<b>F</b> The work environment is safe and healthy, and workers have access to basic needs and services	<ul style="list-style-type: none"> <li>• <b>Hunkemöller</b> Business partners observe this principle when they respect the right to healthy working and living conditions of workers and local communities, without prejudice to the specific expectations set out hereunder. Vulnerable individuals such as - but not limited to - young workers, new and expecting mothers and persons with disabilities, shall receive special protection.</li> <li>• <b>Nike</b> (in their Code Leadership Standards): Pregnancy tests will not be a condition of employment, nor shall they be demanded of employees, Voluntary tests may be provided, but only at the request of the employees, and each such request must be documented. Employees will not be forced or pressured by the contractor to use contraception.</li> </ul>
<b>G</b> Freedom of Association and the Right to Collective Bargaining are respected	<ul style="list-style-type: none"> <li>• <b>Lindex</b> Employees, without distinction whatsoever and irrespective of sex, shall have the right to form and join, or not join, trade unions or similar external representative organisations of their own choosing, subject only to the rules of the organisations concerned, without prior authorisation, and to bargain collectively. Where possible, union or committee meetings should be organised in such a way that allows female employee participation.</li> </ul>
<b>H</b> Workers have a legally binding employment relationship with clear contracts and conditions	<ul style="list-style-type: none"> <li>• <b>Nestle</b> Not avoid obligations to employees under labour or social security laws and regulations arising from the regular employment relationship through the use of labour-only sub-contracting home-working arrangements, apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.</li> </ul>
<b>I</b> Workers can own land and have access to safe natural resources	<ul style="list-style-type: none"> <li>• <b>Unilever</b> The right of women to land ownership and access to land is recognised. Land rights of communities, including indigenous peoples, will be protected and promoted. Business is conducted in a manner which embraces sustainability and reduces environmental impact.</li> <li>• <b>TUI</b> Suppliers shall: (i) commit to reducing their overall environmental impact, while engaging the community to help foster social and economic development; (ii) contribute to the sustainability of the communities in which they operate, with progress assessments on community issues in line with industry standards.</li> </ul>

Sources: [G-STAR Supplier Code Of Conduct](#); [Hunkemöller Ethical Code of Conduct](#); [Lindex Code of Conduct](#); [Nestle Suppliers Code of Conduct](#); [Nike](#); [Mars Supplier Codes of Conduct](#); [Patagonia Supplier Code of Conduct](#); [TUI Supplier Code of Conduct](#); [Unilever Responsible Sourcing Policy](#).



### 5.1.7 CLARIFY ROLES AND RESPONSIBILITIES



To ensure your gender policy is effective, your internal management structure should be clear about roles and responsibilities of each function, department and person within your company regarding the application, monitoring and improvement of your policies related to gender equality. This structure should include:

- Clear roles and responsibilities for each function (quality management, procurement, HR etc), department, and persons.
- Clear governance entities (e.g. steering committees, task forces, programme teams, etc.), with clear definition of hierarchical relationships, and related line management structures.
- Clarity about leverage, and the degree of influence the enterprise has in managing different gender-related risks along the entire supply chain.
- Designated functions (or individuals) with the appropriate mandate and relevant technical and cultural skills to take responsibility for GR-HRDD, with support from a skilled team.
- Visible involvement of senior management in implementing, and ensuring compliance with the enterprise's gender policy.
- A budgetary mechanism to ensure adequate financial resources are made available to the entities tasked with implementing GR-HRDD.

### 5.1.8 COMMUNICATE YOUR POLICIES



After approval by top executives, your company should clearly communicate its gender equality policy to relevant staff, suppliers, and other external stakeholders. This communication should reach both those who are expected to implement your policy (for example, the company's own staff and your suppliers) and those who have a direct interest in its implementation (for example, female rights holders, women's associations, unions, potentially affected communities, investors, consumers, and civil society organisations).

You need to consider what is most effective in terms of content, language and dissemination, given the audiences it is intended for (see also step 5 of your GR-HRDD).

## PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN PRACTICE, SEE THE REPORT, PART 2.





## STEP 2: IDENTIFY & ASSESS GENDER RISKS & ADVERSE IMPACTS



Once you have formulated your gender equality policy, the next step is to make a comprehensive assessment of areas where you may be contributing to gender-specific human rights risks. By coming to a better understanding of the different roles that women play, as well as some of the gender-based dynamics that influence these roles, each company can assess the likelihood of a risk occurring, as well as its potential impact. Such risks could relate, for example, to unequal access to and control of productive resources, services, and employment opportunities. Once identified, companies can prioritise these risks in their GR-HRDD process. Please note that for some companies, it might be preferable to first undertake such an assessment in order to have a good basis for formulating gender policies.

Before we go into the details of risk and impact assessment, we would like to point out a few general principles.

First, the risk and impact analysis should be conducted per individual company: be it the global brand, a supplier for one or more global brands, and so on. Each risk analysis will thus cover the full range of an individual company's own activities, including: long-term investment decisions; day-to-day operations and processes; products and services over their full life cycle; and the specific economic, cultural and geographical contexts in which your company operates. You carry out this analysis to avoid and address adverse impacts associated with your operations, supply chains and other business relationships.

The second principle is closely related to the first one. If you want to work together with one or more suppliers in your GR-HRDD effort, one of the greatest and most frequently encountered challenges is the lack of accurate, up-to-date, and easy to access data, or even a total absence of data. Where data is available, it may be scattered across massive stacks of paper documents and difficult to gather and analyse. Therefore, if you want your suppliers (as individual companies) to gather data and use a joint set of criteria for risk and impact analysis, it is highly recommended that you and your supplier(s) jointly design the "data model" since you want to make sure that they can actually gather this data.

Third, in cases where a supplier is hesitant to conduct a risk assessment and mitigate identified risks, you may need to break the ice before the first phase by opening the discussion about the business benefits of respecting gender-specific human rights (see Chapter 2). If this does not sufficiently persuade suppliers to conduct a risk analysis, you may want to include in your supplier contracts that it is mandatory to conduct a risk analysis, that you provide support to do so, and to subsequently discuss the outcomes, and chosen mitigating measures with you. The choice for a hard or soft approach will depend, to a large extent, on the business relationship you have with the supplier.

### CHALLENGES FOR CORPORATES

Companies that had made efforts to catalogue locally identified risks and discuss these with their suppliers reported that gender and discrimination are very sensitive issues to address, especially in regions where these are deeply rooted. Many companies found that suppliers are unwilling to talk about it for various reasons. One prevailing argument is that suppliers produce goods for many different brands, hence they cannot live up to the diverging demands of all these clients. In other cases, it was reported that brands do not always feel at ease to raise the issue, especially in contexts where their views may be seen as culturally inappropriate. The reality is that faced with many issues to be discussed with their suppliers, global brands tend to neglect gender-specific human rights issues.

Sources: Gender brand awareness training 2019, organised by FWF, Plan International Netherlands, the ILO Training Center and the AGT; interviews with companies 2020.

Fourth, **involving your key stakeholders** – both internally and externally – in this process helps to build a shared understanding on why certain risks (e.g. those with a higher likelihood of occurring and/or a more negative impact) do require more attention than others. It also makes the required changes more manageable. Once you have a good overview of actual, as well as potential risks, you can identify and prioritise the needed mitigating measures (see Step 3 in the next paragraph).

Next, this risk and impact analysis as part of your GR-HRDD approach should not be viewed as a one-off activity but should be **fully integrated** into your regular corporate risk management activities, business improvement initiatives, risk assessments, and supplier performance verification systems.

Sixth, assessing adverse gender impacts, as well as potential risks, is especially needed when:

- you and/or your local or international Tier 1 supplier(s) begin to source products and services from geographical areas associated with medium to high gender-related risks;
- responding to questions from customers or shareholders about the origin of your products/ services and the way these have been produced;
- starting the development of a new product;
- entering a new market, or starting a new business relationship;
- there are substantial changes in the operating environment of a key supplier;
- facing a campaign from an NGO or trade union (which would be a more defensive approach).

In order to incorporate these considerations in your GR-HRDD process, we recommend the following four practical actions to determine the chance of a risk occurring, and to assess the adverse impacts of actual and potential risks in your own operations and supply chains



### 5.2.1 MOBILISE AND INVOLVE THE APPROPRIATE STAKEHOLDERS, AND GAIN MANAGERIAL SUPPORT



While defining a company's gender policy involves a rather limited number of people, assessing gender-specific human rights risks, and their adverse impacts, requires the support of a broader group of stakeholders. Such a multi-stakeholder approach also increases the degree of reliability, completeness, and accessibility of your data and insights.

To facilitate this broader engagement, it helps to **involve employees**, and their organised structures such as workers' councils. Such consultations should also ensure balanced representation across different gender identities where possible and involve all relevant business entities and functional staff (e.g. HR, legal, quality managers). In order to understand the perspectives of those most vulnerable to gender-related human rights abuses, you should involve representatives of (affected) women, as well as women right's organisations and human rights defenders.

Adopting a gender lens also entails being conscious that the **experience of risk varies greatly across affected women**. Young women may face more harassment and abuse than older women. Women of minority or marginalised religious or ethnic groups might see their gender-related risks augmented by discrimination against their specific group. In many countries and religions, lesbian, bisexual and transgender women are likely to face more discrimination (also from other women) than heterosexual women. Pregnant women and mothers may be confronted with more safety and hygiene risks, as well as the likelihood of job termination or salary reductions.

This rather fine-grained distinction of different stakeholders and their exposure to risks might present a bridge too far in your first iterations of risk analysis. This is especially the case if your GR-HRDD maturity is low. It may appear to be overwhelmingly complex or you may not have the detailed data. If so, first focus on “women versus men in general.” Once you have achieved a higher GR-HRDD maturity level, a solid risk management practice is established, awareness is sufficiently raised, more detailed data can be gathered, and budgets are available, then you can focus on more nuanced risks, such as the differentiated experiences of different groups of female rights holders.

Furthermore, to gain deeper insights on issues identified during desk research, it is necessary to **talk with (female) stakeholders outside the presence of men**. This might require facilitating separate (safe) spaces for women to express opinions freely and provide input on business decisions. This is especially the case for consultations involving actors in the broader supply chain.

As your company is dependent on **your suppliers**, they are an important “**sounding board**” in your assessment. Similarly, it is wise to solicit views from independent experts, union members, industry associations, as well as other relevant perspectives that can enhance your understanding of the economic, social, and legal contexts in which you operate, and how these influence gender-related human rights.



### 5.2.2 PREPARE THE RISK ANALYSIS

Once you have the support of your stakeholders, you can make a comprehensive analysis of gender-related human rights risks in your business environment. This includes determining what data is needed, as well as what processes will be used to collect it, assess risks and their impact, and prioritise the risks.

Because context matters, and socio-economic dynamics change constantly, a risk assessment is an ongoing process. It is therefore important to design a practical assessment process that can be integrated in your company’s overall risk and control strategy. This helps to enhance efficiencies and ensure a “systemic” approach that enables you to identify linkages between gender-related risks, and other categories of risks.

#### A Know which potential risks can occur

In order to assess gender-related human rights risks, it helps to distinguish between two categories: internal (or preventable) and external risks.

**Internal (or preventable) risks** are related to unauthorised, illegal, unethical, incorrect, or inappropriate decisions and actions conducted within the confines of the company (whether this company is the global brand or one of its suppliers). It includes all risks that are controllable, and ought to be eliminated or avoided. These risks are also directly related to the nine labour principles outlined in Chapter 3. Exposure to internal / preventable risks is often greatest in jobs and sectors where work is informal or precarious, where wages are low, where workers are prevented from joining or forming trade unions, and where management accountability is low.

PREVENTABLE RISKS YOU MIGHT ENCOUNTER RELATED TO THE NINE LABOUR PRINCIPLES	
HUMAN RIGHTS PRINCIPLE	INTERNAL / PREVENTABLE RISKS
A Workers face no discrimination in recruitment, employment and training	• Discrimination of women in recruitment and recruiting women mostly for lower-level roles.
	• Limited career opportunities for women, or even termination following marriage or pregnancy.
	• Less training opportunities for women.

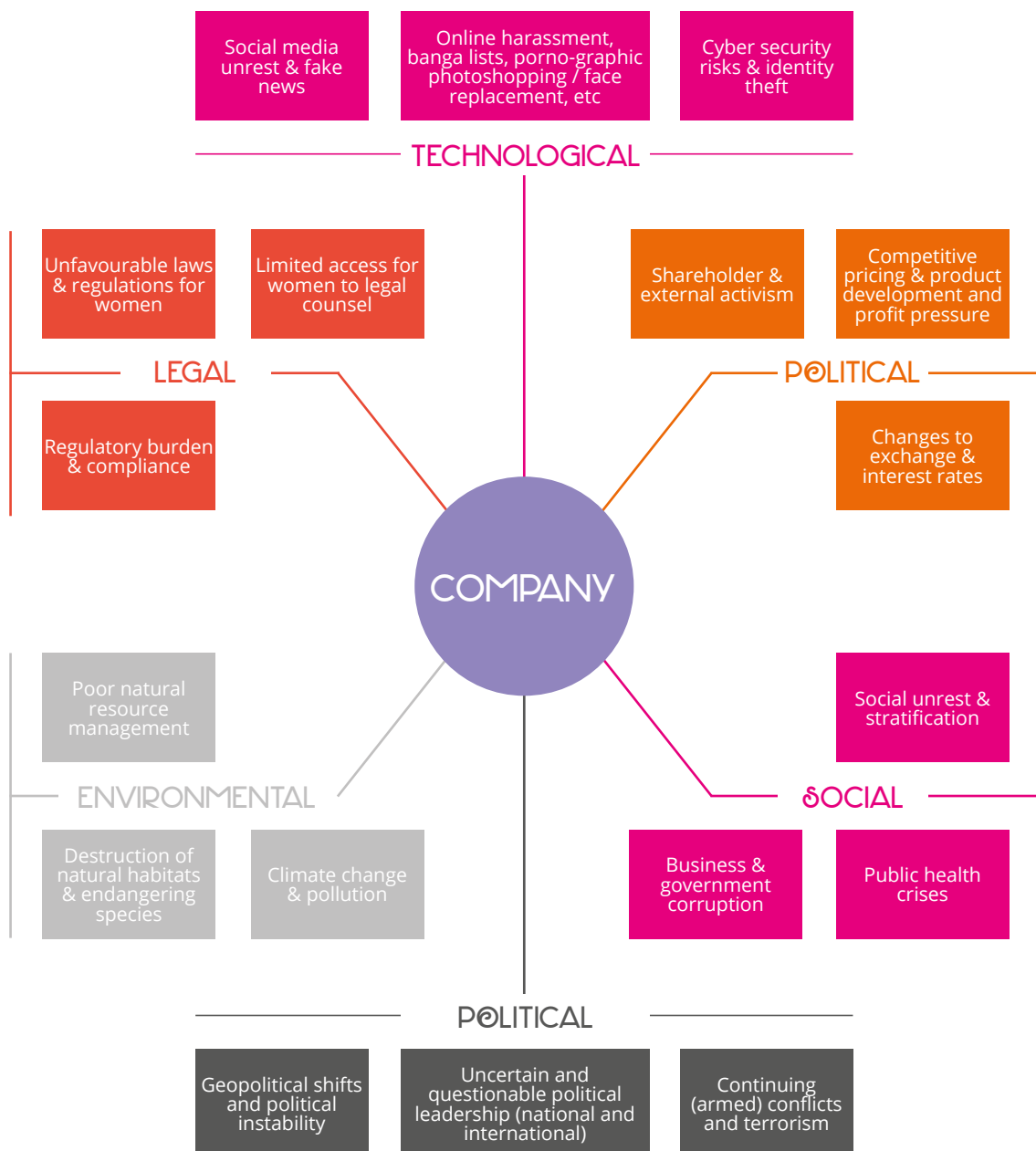
PREVENTABLE RISKS YOU MIGHT ENCOUNTER RELATED TO THE NINE LABOUR PRINCIPLES	
HUMAN RIGHTS PRINCIPLE	INTERNAL / PREVENTABLE RISKS
D Workers receive fair wages and benefits at a living wage level	• Wages, overtime pay, benefits, and paid leave for women are below a living wage.
	• Lower wages, overtime pay, benefits, and paid leave for women is less than for men.
	• No personal bank account and/or wage payments in cash, and no financial support to female (agriculture) producers in their own right.
C Workers work reasonable hours at decent conditions	• Unrealistic daily targets, and overtime too frequently needed, which women find hard to refuse.
	• Punishment, retaliation, or penalties for workers who refuse to work overtime.
	• Overtime not always recorded, and/or not paid out for full.
D Workers freely choose their work, and are not forced, bonded, or obligated to work	• Exploitative practices such as modern slavery, human trafficking, and unknown or last-minute changes to employment contracts.
	• Confiscation of personal identification documents (so women cannot leave the country or apply for social security) and withholding wages.
	• Confinement and threats of physical force.
E Workers are not harassed or abused	• Offensive and sexually-explicit language against women.
	• Unwanted sexual advances from male co-workers, and unwanted physical acts ranging from patting, hitting, and slapping, to serious physical assault, and rape.
	• Abuses, threats, intimidation and/or assaults while at work, resulting in physical, psychological, and/or sexual embarrassment, humiliation, intimidation, annoyance and/or alarm for women.
F The work environment is safe and healthy, and workers have access to basic needs and services	• Unsafe working environment, unsafe commuting to work, and poor safety measures, such as dark spaces, non-working fire alarms, and the lack of protective gear/ personal protective equipment.
	• Unhygienic working environment with inadequate, or no facilities for women (e.g. breast-feeding locations, storage for milk).
	• Poor safety training for women.
G Freedom of Association and the Right to Collective Bargaining are respected	• A lack of awareness about women's human right to associate and engage in collective bargaining.
	• Poor representation of women (and their specific interests) in unions (including at leadership levels), as well as obstruction of women who want to participate in union meetings.
	• Being subjected to threats, bullying, physical assault, or even murder for joining or working for a trade union.
H Workers have a legally binding employment relationship with clear contracts and conditions	• Poor job security and no protection for women in flexible employment arrangements.
	• Use of unscrupulous recruitment agencies.
	• Outsourcing to smaller, cheaper and informal suppliers and female contract workers, with attendant low wages / piece rates, and a lack of benefits.
I Workers can own land and have access to safe natural resources	• Lack of, or low recognition of property rights for women, and their marginalisation as important stakeholders (e.g. in land use, in introducing new production approaches, when using renewable energy sources).
	• Lack of women's participation in decision-making processes that affect land, property and natural resources (unsustainable exploitation of e.g. water, timber wood, etc.) with an impact on the burdens women have to carry (e.g. increased distances to find water).
	• Displacement of local communities from their land to make way for infrastructure, mines, hotels, farms, etc. without any form of free, prior and informed consent and no involvement of women.

### HUNKEMÖLLER: MAKING WORK OF IDENTIFYING RISKS FOR MEN AND WOMEN

Inclusivity is one of our core business values and we believe in empowerment. Numerous studies have shown us the benefits of investing in women and we believe that all workers benefit when the most vulnerable thrive. When monitoring and conducting our risk assessment we have noticed that women often work in lower positions with restricted/less opportunity to develop. Female workers in our supply chain are commonly paid lower wages, promoted less, face restrictive stereotypes and abuse, and juggle more responsibilities at home with longer working hours."

*Rebecka Sancho, CSR manager, in a video made for a storytelling project (by Fair Wear and Plan International Netherlands), to be presented in 2021.*

**External risks** arise from events occurring outside the company, and which are beyond its influence or control. We identify six categories of external risks: political, cyber-security, social, technological, legal, economic, and environmental. Assessing these risks through a gender lens helps understand if they may have a disproportionately higher change of occurrence, and/or a higher impact for women versus men.



Disasters often affect women and men differently due to gender inequalities caused by socio-economic conditions, cultural beliefs, and traditional practices that repeatedly have put females at a disadvantage. Some [studies](#) have actually found that women and children are 14 times more likely than men to die when a natural disaster strikes.

The digital revolution too has a disproportionately negative effect on women (and other non-male gender identities). The risks for women include online harassment, and pornographic photoshopping/face replacement, but also significant job losses due to automation and robotisation in labour-intensive industries.

The COVID-19 pandemic is further highlighting additional risks for women during major health care crises. They not only bear the brunt for taking care of the sick but are also more likely to be in the lowest paid jobs, which are most vulnerable to layoffs (see box).

#### GENDER-SPECIFIC RISKS DUE TO COVID-19: A BUSINESS CASE FOR GR-HRDD

It is important to note that a crisis, as can be seen in the case of the current global health and economic crisis caused by the COVID-19 virus, can have social and economic consequences that exacerbate existing (gender) inequalities, putting the most vulnerable at even greater risk.

The impacts of COVID-19 have far-reaching gendered implications as well as threats in reversing hard won gains on gender equality. Women are leading the health response: making up almost 70% of the healthcare workforce, and exposing them to a greater risk of infection. With the closure of schools and child-care facilities, women are simultaneously shouldering a much greater share of household tasks, adding to longstanding gender inequalities in unpaid work. Furthermore, compounded economic impacts are being felt particularly by women and girls who are generally earning less, saving less, and holding insecure jobs or living close to poverty. Women and girls' who have already been at high risk of violence, exploitation, abuse and/or harassment are seeing an increase during the current COVID-19 crisis.

By undertaking GR-HRDD, companies can make a contribution to rethinking – even transforming – gender relations within their supply chains, and thereby help to create meaningful and sustainable social impact. The OECD explains that taking an “IRBC approach,” and using risk-oriented GR-HRDD to identify and address adverse impacts, would bring short- and long-term benefits. In particular, it would enhance companies' capacity to become more resilient to current and future supply chain disruptions (such as COVID-19, but also other type of crises), and enhance their ability to access private and public finance.

Sources: [UN Women](#); [Clingendael and Partnering for Social Impact 2020 \(commissioned by CNV Internationaal\)](#); [OECD COVID-19 and Responsible Business Conduct](#); [Policy Brief. The impact of COVID-19 on Women, UN, April 2020.](#)

## B Identify the data needed to assess the likelihood and impacts of risks

To identify, and assess, internal and external risks, you need to gather and analyse data that helps you understand the external context in which you operate, the general profile of your own business, and the risks you may face within your business.

### I. Data on your external context

The context in which you operate may significantly influence the chances of risks occurring and/or their negative impacts. Therefore, it is important to know where women may be disproportionately affected. Examples include:

- Countries where women face severe discrimination due to existing gender norms, power relations, and patriarchal political, economic and cultural structures.
- Locations where the company's own activities significantly affect the local economy, environment, and access to land and livelihoods for local communities.
- Conflict, and post-conflict areas.
- Sectors that employ large numbers of women, such as apparel, electronics, tourism, health and social care, domestic work, agriculture (including fisheries), and fresh-cut flowers.



## II. Data on your business and the risks you may face

To determine the likelihood that a company faces gender-specific human rights risks, it is good to distinguish three types of indicators, as outlined in the BSR report '[Making women count.](#)' These are:

1. what the characteristics of the company's workforce are (workforce profile indicators)
2. how well the company's workforce is performing (workforce performance indicators)
3. what data shows you which risks you actually run into, and which will negatively impact your workforce (risk indicators or worker impact indicators)

Examples of these three different sets of indicators are included in the tables below.

AD 1. EXAMPLES OF WORKFORCE PROFILE INDICATORS (NON-EXHAUSTIVE), ALL DATA DISAGGREGATED FOR MEN AND WOMEN			
<ul style="list-style-type: none"> <li>• Number of employees</li> <li>• Number of board of directors, executives</li> <li>• Percentage of management/supervisors</li> <li>• Number of production workers</li> </ul>	<ul style="list-style-type: none"> <li>• Number of apprentices</li> <li>• Number of young workers</li> <li>• Number of migrant workers</li> <li>• Percentage of pregnancy/maternity leave versus total time available</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of permanent employees</li> <li>• Percentage of employees paid by hour</li> <li>• Percentage of employees paid by piece</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of workers employed by sub-contractors</li> <li>• Percentage of home workers vs. on-site workers</li> </ul>

AD 2. EXAMPLES OF WORKFORCE PERFORMANCE INDICATORS (NON-EXHAUSTIVE), BUSINESS OPERATIONS			
<ul style="list-style-type: none"> <li>• Revenue and profit per employee</li> <li>• Percentage turnover</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage absenteeism</li> <li>• Productivity ratio</li> <li>• Number of units produced</li> </ul>	<ul style="list-style-type: none"> <li>• Percentage of product defects / errors</li> <li>• Net promotor score</li> </ul>	<ul style="list-style-type: none"> <li>• Handling time, first-call resolution, contact quality</li> <li>• Overtime per employee</li> </ul>

AD 3. EXAMPLES OF RISK INDICATORS (OR WORKER IMPACT INDICATORS) TO IDENTIFY PREVENTABLE RISKS		
HUMAN RIGHTS PRINCIPLE	PREVENTABLE RISKS	RISK INDICATORS
A Workers face no discrimination in recruitment, employment and training	Discrimination in recruitment and bias in favour of men	<ul style="list-style-type: none"> <li>• % of vacancy texts formulated in a gender-inclusive way</li> <li>• % women recruited of total recruits</li> <li>• % women satisfied with the recruitment process</li> <li>• % women recruited in executive functions (related to minimum targets / quota)</li> <li>• % women recruited per job type.</li> <li>• % women hired with a permanent contract</li> <li>• % women hired with a flexible contract</li> <li>• # involuntary pregnancy tests as condition of employment</li> </ul>
	Limited career opportunities for women	<ul style="list-style-type: none"> <li>• % promotions of female employees to executive positions</li> <li>• % promotions of female employees to management / supervisor positions</li> <li>• % promotions of women to non-management positions</li> <li>• % dismissals/resignations due to getting married or getting pregnant</li> <li>• return rates from pregnancy and maternity leave</li> </ul>
	Less training opportunities for women	<ul style="list-style-type: none"> <li>• % women participating in and completing education and training programmes</li> <li>• % women who think gender norms negatively impact training opportunities</li> </ul>
B Workers receive fair wages and benefits at a living wage level	Wages, overtime pay, benefits and paid leave for women do not meet living wage level	<ul style="list-style-type: none"> <li>• % women with wages below living wage standard</li> <li>• % women with hourly rates / piece below living wage standard</li> </ul>
	Lower wages, overtime pay, benefits and paid leave for women than men	<ul style="list-style-type: none"> <li>• % women with lower wages &amp; benefits than men for equal tasks</li> <li>• % women that get maternity pay, childcare pay or sick pay</li> <li>• % women that are denied sick leave or maternity leave</li> <li>• % women whose wages are reduced after pregnancy or illness</li> </ul>
	No personal bank account/ wage payments in cash	<ul style="list-style-type: none"> <li>• % women with a personal bank account and with full control of this account</li> </ul>
C Workers work reasonable hours at decent conditions	Unrealistic daily targets and overtime too frequently needed	<ul style="list-style-type: none"> <li>• % consistent production targets for women &amp; men for same job</li> <li>• % women who feel that production targets are realistic</li> </ul>
	Who refuses to do overtime is punished, retaliated against or penalised	<ul style="list-style-type: none"> <li>• % contracts that stipulate ways to voluntarily agree to overtime</li> <li>• % of involuntary overtime for women vs. regular hours per week</li> </ul>
	Overtime not always recorded and/or not paid out for full	<ul style="list-style-type: none"> <li>• % accurate records of regular hours and overtime hours worked</li> <li>• % women who get less than 150% overtime pay versus regular salary</li> </ul>

AD 3. EXAMPLES OF RISK INDICATORS (OR WORKER IMPACT INDICATORS) TO IDENTIFY PREVENTABLE RISKS		
HUMAN RIGHTS PRINCIPLE	PREVENTABLE RISKS	RISK INDICATORS
D Workers freely choose their work, and are not forced, bonded, or obligated to work	Modern slavery & human trafficking	<ul style="list-style-type: none"> <li>• # of women in forced labour situations in the company</li> <li>• % women who paid recruitment fees to acquire a job</li> <li>• % female workers who understood the contract terms</li> </ul>
	Confiscation of personal identification documents & withholding wages	<ul style="list-style-type: none"> <li>• % of workers allowed to maintain their identification documents</li> <li>• % women whose salary is deducted for protective equipment, identity papers, accommodation, food, clothing, transport, health checks, etc.</li> <li>• % of bank accounts where more than one worker has access</li> </ul>
	Confinement & physical force	<ul style="list-style-type: none"> <li>• % of workers who can freely choose their own accommodation</li> <li>• % of workers who can leave their accommodation freely and unaccompanied</li> </ul>
E Workers are not harassed or abused	Offensive and sexually-explicit language against women	<ul style="list-style-type: none"> <li>• % women who feel safe at work</li> <li>• % women who report offensive and sexually-explicit language (also digitally)</li> </ul>
	Unwanted sexual advances from male co-workers	<ul style="list-style-type: none"> <li>• % women who feel intimidated by or receive sexual advances from a supervisor</li> <li>• % women who feel intimidated during security checks</li> <li>• # women subject to full body search by male security guards</li> </ul>
	Abuses, threats, intimidation and/ or assaults while at work	<ul style="list-style-type: none"> <li>• % women who feel that the facility has (confidential &amp; unbiased) mechanisms in place to protect them from harassment or abuse</li> <li>• % workers who received adequate training on sexual harassment</li> <li>• % harassment records that cover the necessary detail (including type &amp; severity of harassment, timeframe between raising the grievance and corrective action)</li> </ul>
F The work environment is safe and healthy, and workers have access to basic needs and services	Unsafe working environment & poor safety measures	<ul style="list-style-type: none"> <li>• % women who feel that health &amp; wellbeing needs are adequately addressed</li> <li>• % women that have easy access to an on-site doctor/ nurse or external health provider that can meet all their health and wellbeing needs</li> <li>• % women who feel comfortable accessing on-site health-care facilities</li> </ul>
	Unhygienic working environment and no separate facilities for women	<ul style="list-style-type: none"> <li>• % women who can access restrooms, feminine hygiene products &amp; medical facilities without restrictions</li> <li>• # women absent due do menstrual-related reasons</li> <li>• # of complaints regarding forced use of contraception</li> <li>• # of pregnant workers performing dangerous or unsuitable tasks</li> </ul>
	Poor safety training for women	<ul style="list-style-type: none"> <li>• % women trained in gender-based violence awareness</li> <li>• % men trained on gender-based violence awareness</li> </ul>
G Freedom of Association and the Right to Collective Bargaining are respected	Lack of awareness of the human right to associate	<ul style="list-style-type: none"> <li>• % women encouraged to express their views on workplace issues</li> <li>• % women aware of 'freedom of association &amp; collective bargaining' rights</li> </ul>

AD 3. EXAMPLES OF RISK INDICATORS (OR WORKER IMPACT INDICATORS) TO IDENTIFY PREVENTABLE RISKS		
HUMAN RIGHTS PRINCIPLE	PREVENTABLE RISKS	RISK INDICATORS
	Poor representation of women in unions (including at leadership levels) and prevention of women to participate in union meetings	<ul style="list-style-type: none"> <li>• % women feeling their views are represented by union or worker committees</li> <li>• % female members of producer associations, unions and workers' councils</li> <li>• % female leaders in producer associations and unions and workers' councils</li> <li>• % union/committee meetings that are held at times &amp; in locations that make it easy for women to participate</li> </ul>
	Being threatened, bullied, beaten, or even killed for joining or working for a trade union	<ul style="list-style-type: none"> <li>• % women who feel confident enough to speak out to union reps about the issues they face in the workplace</li> <li>• # of harassment complaints by women for joining or working for a union</li> <li>• # of female deaths related to joining or working for a union</li> </ul>
H Workers have a legally binding employment relationship with clear contracts and conditions	Poor job security and protection for women in flexible employment arrangements	<ul style="list-style-type: none"> <li>• % women who have signed their contracts</li> <li>• % women whose legally required documentation is on site</li> <li>• % recurring fixed term contracts for women used to avoid permanent jobs</li> </ul>
	Use of unregistered recruitment agencies	<ul style="list-style-type: none"> <li>• % recruitment agencies who comply with the highest quality standards</li> </ul>
	Outsourcing to cheaper and informal suppliers / contract workers	<ul style="list-style-type: none"> <li>• Uptake rate of permanent versus flexible working arrangements for women</li> <li>• # women working for unauthorised subcontractors</li> </ul>
I Workers can own land and have access to safe natural resources	Destruction and pollution of living environments, affecting women	<ul style="list-style-type: none"> <li>• # of complaints and formal lawsuits against the company for destruction and/or pollution of living environments, where women have been disproportionately affected</li> </ul>
	Industries that monopolise or excessively use scarce natural and human-made resources	<ul style="list-style-type: none"> <li>• # of formal complaints of NGOs / women's organisations against the company for monopolisation of scarce natural and human-made resources</li> </ul>
	Displacement of locals from their land	<ul style="list-style-type: none"> <li>• Lack of any form of free, prior and informed consent and no engagement of women.</li> </ul>

Data related to these preventable risks can ideally be derived from the company's (be it a global brand or a supplier) own sources, namely:

- company reports / audit reports
- HR systems (including contracting, recruitment, payroll and training systems)
- whistle-blower / speak-up complaints
- incidents gathered via your grievance mechanisms
- self-assessments by business units
- management reports by relevant functions (for example, HR, compliance, CSR/sustainability)
- reports of workers' councils and other worker representative bodies

Data related to potential risks can also be gathered through a wide range of sources, such as publicly available studies on the social and cultural fabric and economic state of a country, region or economic sector, as well as more targeted research on specific production locations, or external trends. Examples include the [CSR Risk Checker](#), the [Modint due diligence tool](#) (to help garment and textile companies to determine the risks in their supply chain), the [Fair Wear Foundation's country reports](#), the [Fair Wear gender fact sheets](#), and the [Danish Center for BHR](#). You can find more information in the [Helpful Resources](#) section.



### 5.2.3 CONDUCT THE RISK ANALYSIS



Once you have finished designing your data gathering and risk assessment process within the context of GR-HRDD, it is time to actually identify and prioritise the risks related to the position of women and men in your company.

The most effective and efficient way to conduct a risk analysis for each organisational entity within scope of the risk assessment, is to carry out the following four activities:

1. Doing desk research to gather and analyse the afore mentioned gender-disaggregated data and information that gives you broad insights on **actual and potential risks and their likelihood of occurrence**.
2. Getting more in-depth insights about the **impact of these risks** among rights holders through desk research, surveys and a few interviews (for example with rights holders, physicians, gender experts, and women's organisations).
3. **Prioritising the identified risks** in a risk heat map (a matrix with two axes: likelihood of the risks occurring on the horizontal axis, and impact of the risk on the vertical axis). This enables you to prioritise subsequent interventions since it may be difficult to tackle all risks simultaneously due to limited financial and human resources.
4. **Identifying overlapping and/or accumulated vulnerabilities** that affect women, since most risks related to the nine labour principles do not exist in isolation.

The accompanying GR-HRDD Workbook provides you with a [practical template](#) for assessing the likelihood and impact of the most common gender-specific human rights risks. It also automatically calculates the risk factor (the product of likelihood times impact). A snapshot of this template is provided in the table below. It can be used for your company as a whole, or per individual business unit or subsidiary.



HUMAN RIGHTS PRINCIPLES	INTERNAL / PREVENTABLE RISKS	CHANCE (1 - 4)	IMPACT (1 - 4)
A Workers face no discrimination in recruitment, employment and training	Discrimination in recruitment & biased in favour of men	4	4
	Limited career opportunities for women	3	4
	Less training opportunities for women	3	2
B Workers receive fair wages and benefits at a living wage level	Wages, overtime pay, benefits and paid leave for women do not meet living wage level	2	4
	Lower wages, overtime pay, benefits and paid leave for women than men	1	3
	Not having control over income, not having a personal bank account and receiving wage payments in cash	2	1

EXTERNAL RISK CATEGORY	SPECIFIC EXTERNAL RISKS	CHANCE (1 - 4)	IMPACT (1 - 4)
1 Political	Uncertain and questionable political leadership (national and international)	3	2
	Geopolitical shifts and political instability	1	2
	Continuing (armed) conflicts and terrorism	3	4
2 Social	Business and government corruption	4	2
	Public health crises	2	4
	Social unrest and stratification	3	3

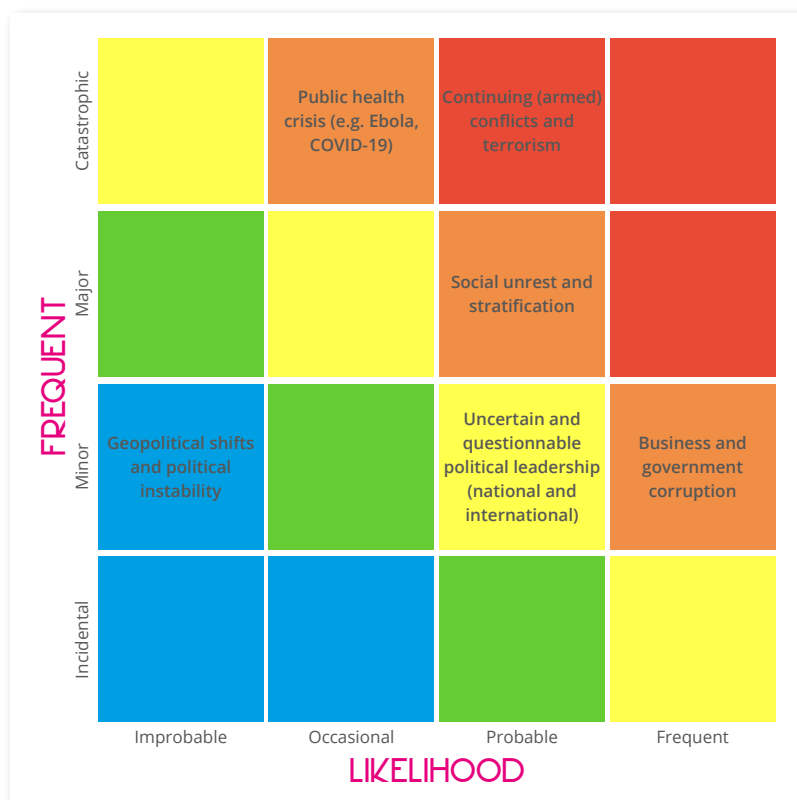
The next table exemplifies the risk heat maps with prioritised risks that results from the risk analysis in the tables above.

### Examples of a risk heat map

Heat map for internal / preventable risks



Heat map for external risks ↓



#### 5.2.4 CONDUCT IN-DEPTH IMPACT & ROOT CAUSE ANALYSES FOR URGENT RISKS



Once you have gained broad insights on overall risk factors, you can make efforts to **deepen your understanding** of their negative impacts on rights holders in specific contexts.

You will also be interested to understand **why specific risks are occurring** and why some are particularly persistent in your company. This will provide you with some clues that can help determine the most appropriate risk mitigating measures.

##### A In-dept impact assesment

Gender-sensitive human rights impact assessments should identify both actual and potential impacts. According to the UN Guiding Principles, businesses are required to distinguish between three types of impacts:

- impacts caused by the business
- impacts that the business contributes to, and
- impacts linked to a company through its business relationships

Impact assessment should also involve assessing the severity of an impact, by considering, the scope, scale, and remediability of the impacts, among others. This requires considering impacts from the perspectives of those who are experiencing them, and drawing on the normative content of international human rights standards.

One powerful tool you can use is the **Challenger Interview**. It focuses on asking why the risk and its impact(s) “even matter.” The Challenger Interview teaches you about people’s underlying values, norms and expectations in order to discover the real problem, challenge, or opportunity you should be solving for. **Role playing** might also be helpful. Seeing the world from someone else’s perspective can reveal deep insights into the root cause of a risk.

##### B Unearthing the root causes of the most salient risks

The ultimate objective of an impact assessment should be to mitigate the likelihood that identified risks actually materialise, and/or to limit their impact. Root cause analysis is one of the most important elements of risk mitigation. Rather than just remedying the negative impact of a risk (e.g. reinstating a female worker who was fired because she became pregnant), it helps you to tackle the underlying causes (e.g. poor training of male managers, lack of a clear HR policy on retention, lack of gender diversity targets, etc.).

The following example of how to trace the root cause of a human rights risk is derived from a 2017 ETI/ILO survey of 1,500 supplier companies in 87 countries. One of your suppliers forces their employees to work more overtime than is healthy. They also delay payments and resort to violence to push employees to meet unrealistic targets. This despite being endorsed by your stringent supplier codes of conduct. One of the root causes you might uncover may be that your own purchasing practices result in too frequent, and last-minute changes, against extremely low prices in your purchase orders. This means that the supplier cannot accommodate in any other way than enforcing overtime and pushing workers too hard to meet unrealistic production targets.

Source: [ETI/ILO](#)

There are a number of **assessment tools** that can help you identify the root causes of gender-based human rights risks, as well as the underlying systemic issues. It is helpful to actively engage your female workers and women’s rights organisations in this root cause analysis.

Examples of useful root cause analysis methods include:

- **The 5 why's.** This is a method that uses a series of questions to drill down into successive layers of a problem. Ask yourself, "Why did the risk occur?" Once you've come up with a potential reason, ask why that happened. Do this in succession until you've asked "why?" five times.
- **Event correlation.** This is a sense-making technique to help understand how a diverse set of events can work together to enhance the likelihood occurrence, as well as the scale of impact of a certain risk. By looking for, and analysing relationships among events, one can pinpoint the most significant events within the broader mass of information.

### C Identify the systemic issues in norms, competencies & processes

Once you have identified the root causes of the most salient risks to address, you will also have much more clarity about which mitigating efforts are likely to be most successful. But it is also advisable to spend a bit of time to take a deep dive into systemic issues that underly these seemingly diverse root causes. If you can put your finger on these systemic issues, you can find mitigating measures that will simultaneously solve multiple problems.

For example, several root causes of risks related to harassment, wages and discrimination may relate to the (often implicit) core beliefs and culture of your staff or societal norms and values.<sup>1</sup> These include ideas about women's mobility outside the home, the value of women's and men's work, and the justification of violence and harassment against women. These norms are often so steeped in culture that the discriminated groups themselves believe they are inferior and deserve to be abused. This may mean that neither men nor women inform others about the negative experiences that they are enduring. Other cultural customs include the "normalisation of violent behaviour," the lower social status of certain jobs, and the practice of treating low-level employees in an aggressive way.

Another example of a systemic issue associated with the root causes of too-low wages and too much overtime, is the market philosophies of your decision makers, and their understanding of consumer behaviour. This may contribute to a marketing strategy focused on frequent last-minute changes to seasonal collections. It in turn puts enormous pressure on your purchasing practices, resulting in unrealistic demands on your suppliers. The pressure created may make it close to impossible for them to meet the criteria set out in your supplier codes of conduct. The net result is that they may they shift the burden of these changed orders to female employees.

<sup>1</sup> [United Nations High Level Panel \(UNHLP\) 2016: 3. Leave No One Behind. A call to Action to Gender Equality and Women's Economic Empowerment.](#)

## PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN PRACTICE, SEE THE REPORT, PART 2.







## STEP 3: CEASE, PREVENT OR MITIGATE GENDER RISKS



At this stage, you have undertaken a thorough assessment of your company's (potential) gender-related human rights risks and gained a deeper understanding of their impacts. The next step is to cease, prevent or mitigate these gender-specific human rights risks and prevent any further negative impacts on rights holders.

Risk mitigation means implementing proactive as well as reactive interventions that help reduce the likelihood of risks being realised. It is also about reducing the potential impacts of such risks, or making their effects less unpleasant, harmful, or serious. In order to ensure that these actions are sufficiently robust to address the root causes of the risks identified, it may be necessary to adjust budget allocations as well as your operational and decision-making processes.



To speed up your risk mitigation efforts, and make them more (cost-) effective, it makes sense to draw on the existing "suite" of commonly used mitigating measures, rather than reinventing the wheel. In the next sections, we explore in more detail some of the approaches that companies use to mitigate both preventable (within their immediate business environment) and external risks.

### 5.3.1 MITIGATING PREVENTABLE RISKS



There are basically two risk-mitigating approaches that you can apply when dealing with internal / preventable risks:

- cease activities, or find alternatives to eliminate the risks, and hence remove the negative impact on rights holders
- mitigate risks to reduce the likelihood of a risk occurring and/or the negative impact on rights holders

#### **Cease activities, or find alternatives to avoid the internal / preventable risk entirely**

Some generic actions that you – as a (global) brand or as a supplier – can undertake to cease harmful business practices, and hence avoid the risks entirely include (based on the OECD Guidelines, p. 29-31):

- Assigning relevant senior responsibility to cease activities that cause or contribute to adverse impacts on women, and to avoid activities that may cause or contribute to adverse impacts in the future.
- Consulting with, and engaging impacted (and potentially impacted) female rights holders together with their representatives (women's organisations, female representatives in trade unions, anti-harassment committees, etc.), to devise appropriate actions, implement the agreed plan, and report on progress.
- Updating the enterprise's strategy and policies, as well as its portfolio of products and services, to provide guidance to managers, suppliers, and others involved. The guidance should include practical steps for avoiding the risk-prone activities and addressing any adverse impacts on women in the future, as well as ensuring their implementation.

- In cases where measures to cease or avoid activities might require complex, difficult and time-consuming responses due to operational, contractual or legal issues, it may be necessary to create a roadmap. This contains clear actions and milestones for your teams as well as female rightsholders so they know when the identified risky activities will be stopped.
- In case of collective or cumulative impacts on women (i.e. where the enterprise is one of several entities contributing to an adverse impact(s), seek to engage (where appropriate) the other involved entities to agree on a joint way forward. This could include stopping the harmful activities, or preventing risks from materialising or recurring (e.g. through industry initiatives and engagement with governments).
- In cases where the enterprise is contributing to adverse impacts that are caused by another entity, build and use your leverage to cease the business activities and procedures that cause these impacts.
- Ensuring – either through contractual and commercial terms or alternative means such as direct payments or investments – that suppliers have the incentives and (long term) financial capacity to cease or avoid risky activities, and therewith to comply with your human rights and gender equality standards;
- Disengaging from business relationships with suppliers after failed attempts at mitigation, or where the enterprise deems mitigation of gender-related risks not feasible, or because of the severity of the adverse impact. A decision to disengage should take into account potential adverse social-economic impacts.

### Mitigating measures to reduce the likelihood and/or impact of preventable risks

**Generic** mitigating strategies to reduce the likelihood of gender-related risks occurring, and/or the impact of these risks include:

- Providing fit-for-purpose gender awareness training on each of the nine human rights principles to relevant management and workers (also at supplier level). The training should cover, among other topics, the business benefits of gender equality, relevance of gender-specific policies, some typical risks and impacts faced by women, and gender-responsible behaviour at work (including how to interact with male and female colleagues).
- Continuing your relationship with suppliers who may have violated your codes of conduct regarding gender-specific human rights, but who commit to do their utmost to ensure that this will not happen in the future. This also includes helping them in this process.
- Temporarily suspending your business relationship with a supplier who is significantly underperforming in terms of GR-HRDD, while simultaneously pursuing risk mitigation with a view to restarting the relationship once adequate measures have been taken.
- Deferring decisions that will “lock in” a risk. This enables you to take more time to understand the risk, find mechanisms to eliminate or reduce it (together with rights holders), or cancel the planned action altogether.
- Developing gender-sensitive warning systems and protection for whistle-blowers within your company, and being open to receive complaints related to your suppliers.
- Publishing reports about complaints received, as well as corrective actions taken.
- Setting aside a contingency budget (risk buffer) to cover potential risks.

Examples of **specific** gender-related mitigating measures for all of the risks associated with the nine labour rights principles are listed in the table below.

EXAMPLES OF SPECIFIC GENDER-RELATED MITIGATING MEASURES		
HUMAN RIGHTS PRINCIPLE	RISK CATEGORY	POSSIBLE INTERVENTIONS TO REDUCE THE LIKELIHOOD OF GENDER-RELATED RISKS OCCURRING, AND/OR THE IMPACT OF THESE RISKS
A Workers face no discrimination in recruitment, employment and training	Discrimination in recruitment & biased in favour of men	<ul style="list-style-type: none"> <li>• Raise awareness amongst male &amp; female recruiters on the benefits of non-discrimination in recruitment, change their biases, and improve their recruitment skills and non-discriminatory recruitment methods.</li> <li>• Write Job advertisements in a 'gender neutral' way, ensuring you use inclusive language.</li> <li>• Remove gender-identifying information from the application or resume of an applicant to minimise the risk of bias occurring against the applicant based on their gender (gender neutral recruitment).</li> <li>• Prohibit the shortlisting/selection of candidates based on marital status and pregnancy.</li> <li>• Involve female staff in recruitment processes (in committees for example) and provide them with an equal say in hiring, wage levels, promotion and termination processes, and associated decisions.</li> <li>• Highlight your non-discrimination efforts, and their positive impacts, in your marketing communication, for example through sincere and thought-provoking stories to win consumers' trust and wallet share.</li> <li>• Set minimum targets for the ratio of men and women across all functions and hierarchical levels.</li> <li>• Link executive pay to gender diversity targets, and award qualitative (non-financial) bonuses to those executives and managers who achieve these targets.</li> <li>• Communicate your policies and (supplier) codes of conduct in local languages to ensure that all employees are aware of their rights and opportunities under labour laws.</li> </ul>
	Limited career opportunities for women	<ul style="list-style-type: none"> <li>• Highlight career opportunities for women, as well as positive effects of gender diversity on innovation, product quality and productivity in your R&amp;D, marketing and production strategies.</li> <li>• Prohibit the limitation or termination of career opportunities by managers due, for example, to pregnancy or maternity leave by an employee.</li> <li>• Use the free time caused by reduced demand – for example due to economic slowdown – to provide supplementary training to your workforce and suppliers, in a gender-inclusive manner. This will enhance your competitiveness over the long term.</li> </ul>
	Less training opportunities for women	<ul style="list-style-type: none"> <li>• Provide equal access to mandatory education and training for women so they can empower themselves and be prepared for the demands of the labour market.</li> <li>• Set mandatory management targets related to equal training opportunities for men and women during business hours (thus not conflicting with duties at home) to ensure that training and professional development opportunities are accessible to all genders.</li> </ul>
B Workers receive fair wages and benefits at a living wage level	Wages, overtime pay, benefits and paid leave do not meet living wage level	<ul style="list-style-type: none"> <li>• If suppliers choose to follow a hiring process that results in recruitment fees, or advances, loans or transaction costs of any kind, the suppliers, and not their employees, must bear these costs.</li> <li>• Encourage workers to use available leave balances when lay-offs are imminent, for example due to economic downturn caused by external crises such as the COVID-19 pandemic.</li> </ul>

EXAMPLES OF SPECIFIC GENDER-RELATED MITIGATING MEASURES		
HUMAN RIGHTS PRINCIPLE	RISK CATEGORY	POSSIBLE INTERVENTIONS TO REDUCE THE LIKELIHOOD OF GENDER-RELATED RISKS OCCURRING, AND/OR THE IMPACT OF THESE RISKS
	Lower wages etc. for women than men	<ul style="list-style-type: none"> <li>• Flag sudden deductions from wages to check if these don't result from disciplinary measures.</li> <li>• If more overtime is needed than voluntarily accepted by workers, ensure adequate compensation of between 250 - 300% of the regular wage.</li> <li>• In your audit report, flag sudden deductions from wages from women to ensure that these are not due to disciplinary measures taken against women.</li> </ul>
	Women do not have control over income	<ul style="list-style-type: none"> <li>• If needed, support female employees to open a bank account to safely receive their salary and other payments (wage digitisation). This will give them more control over their income.</li> <li>• Pay wages and benefits directly to women's mobile phones so they do not need to travel to banks to collect cash (which can be dangerous, time consuming and costly), give them more control over their finances, and making it easier to make digital payments themselves.</li> </ul>
C Workers work reasonable hours at decent conditions	Overtime too frequently needed, not always recorded and/or not paid out for full	<ul style="list-style-type: none"> <li>• Prohibit your business units from setting piece-rate production targets so high that your own (female) employees or those of your suppliers must work overtime to earn the equivalent of the legal minimum wage. Engage in discussions with supplier to ensure that both parties know what types of orders and changes are realistic and which not. Also ensure that suppliers know how to interact with you if you do request unrealistic orders.</li> <li>• Limit the frequency of changes to your product collection (e.g. seasonal collections) or sales and discount promotions, and instead aim to make collections more exclusive and durable.</li> </ul>
	Who refuses to do overtime is punished	<ul style="list-style-type: none"> <li>• Provide training to managers to ensure they do not punish, retaliate against, or penalise employees that choose not to work overtime.</li> </ul>
	Unrealistic daily targets to employees	<ul style="list-style-type: none"> <li>• Ensure that targets for your sales planning, and resulting procurement orders, do not fluctuate beyond pre-specified boundaries. This is to prevent that targets set for employees are achieved without providing for (paid) overtime work.</li> </ul>
D Workers freely choose their work, and are not forced, bonded, or obligated to work	Modern slavery & human trafficking	<ul style="list-style-type: none"> <li>• Provide in-business and community education and awareness training about human trafficking, what it is and where it exists.</li> <li>• When no time limits are defined by law, pay out salaries at least once a month.</li> <li>• Require from all your business units and all suppliers that workers know that they cannot be charged (recruitment) fees, or be required to leave a deposit to ensure their return to the factory if they choose to travel during time off.</li> <li>• Promote female entrepreneurs as contractors and direct investment in adolescent girls and adult women with a combination of micro-finance loans and micro-insurance schemes to prevent loans creating further debt for beneficiaries if the ventures fail.</li> <li>• If you discover incidents of forced labour, ensure that victims are released, provided with necessary support (such as compensating injury, loss or harm), and that perpetrators are brought to justice.</li> </ul>

EXAMPLES OF SPECIFIC GENDER-RELATED MITIGATING MEASURES		
HUMAN RIGHTS PRINCIPLE	RISK CATEGORY	POSSIBLE INTERVENTIONS TO REDUCE THE LIKELIHOOD OF GENDER-RELATED RISKS OCCURRING, AND/OR THE IMPACT OF THESE RISKS
	Modern slavery & human trafficking	<ul style="list-style-type: none"> <li>In cases of forced labour, end practices of victim-blaming and victim-shaming that suppress economic opportunities for survivors, retraumatizes survivors, and imposes unfair and unreasonable costs upon them for what exploiters and abusers did.</li> <li>Employ former victims of exploitation and trafficking and provide them with a sustainable career path.</li> </ul>
	Confiscation of personal identification documents & withholding wages	<ul style="list-style-type: none"> <li>If an employee has been “forced” to pay for her job (for example through fees for recruitment, health checks, or documentation costs) ensure that you pay back the amount paid in full (or more).</li> <li>Require from all your business units and all suppliers that workers know that they may retain their passport and all other documents.</li> <li>Pay all wages, including for overtime, within the legally defined time limits.</li> </ul>
	Confinement & physical force	<ul style="list-style-type: none"> <li>Facilitate employees to look for similar, or better accommodation alternatives, if they do not want to be housed in company-owned facilities.</li> </ul>
<b>E</b> Workers are not harassed or abused	Offensive and sexually explicit language against women	<ul style="list-style-type: none"> <li>Appoint female overseers and security guards where there is a predominantly female labour force.</li> <li>Invest in preventive measures, such as safe transportation for female employees (e.g. when travelling in the dark).</li> <li>Limit the use of informal labour.</li> <li>If harassment or abuse takes place, focus on immediate support for the victim, such as providing physical and psychological healthcare. Also support criminal prosecution for perpetrators to ensure justice, and prevent the recurrence of similar actions.</li> <li>Promote gender-responsible behaviour by showcasing good practices, for example rewarding teams or units that have no complaints related to harassment and abuse.</li> <li>Organise mandatory trainings for all managers and workers to sensitise them about the importance of not engaging in (gender-based) abuse, threats, intimidation, or assault, both within the company and outside of work.</li> </ul>
	Unwanted sexual advances from managers & co-workers	
	Abuses, threats, intimidation and/ or assaults while at work	
<b>F</b> The work environment is safe and healthy, and workers have access to basic needs and services	Unsafe working environment & poor safety measures	<ul style="list-style-type: none"> <li>Provide adequate Occupational Health and Safety (OHS) measures at manufacturing and office sites for all staff. These include working fire alarms, easily accessible doors and fire escape routes, fire extinguishers, protective personal equipment for machine operators, and adequate ventilation systems.</li> </ul>
	Unhygienic working environment and no separate facilities for women	<ul style="list-style-type: none"> <li>Staff your on-site clinics with female doctors and nurses to provide adequate support for sexual, reproductive and mental health.</li> <li>Provide adequate facilities and support for pregnant employees as well as new parents, including maternity leave, child-care support (on- or off-premises), flexible work arrangements, safe food and water, hygienic sanitary facilities, and extra protection against dangerous chemicals.</li> </ul>
	Poor safety training for women	<ul style="list-style-type: none"> <li>Stimulate adherence to these safety and hygiene standards and practices through mandatory trainings for all managers and workers (male and female).</li> </ul>

EXAMPLES OF SPECIFIC GENDER-RELATED MITIGATING MEASURES		
HUMAN RIGHTS PRINCIPLE	RISK CATEGORY	POSSIBLE INTERVENTIONS TO REDUCE THE LIKELIHOOD OF GENDER-RELATED RISKS OCCURRING, AND/OR THE IMPACT OF THESE RISKS
G Freedom of Association and the Right to Collective Bargaining are respected	Unawareness of the human right to associate	<ul style="list-style-type: none"> <li>Communicate with, and train managers, suppliers and workers so that they are aware of their right to organise themselves in workers' councils and unions.</li> <li>Encourage, and facilitate your suppliers to communicate that they work for you and that you value and demand freedom of association.</li> </ul>
	Poor representation of women in unions	<ul style="list-style-type: none"> <li>Stimulate and facilitate trade unions and workers councils to recruit women in their leadership teams, and to adequately represent gender issues and risks.</li> <li>Facilitate women's equal and meaningful participation in consultations and negotiations.</li> </ul>
	Being threatened when joining, or working for a trade union	<ul style="list-style-type: none"> <li>Protect female employees who have organised themselves and/or have joined a union or workers' council.</li> </ul>
H Workers have a legally binding employment relationship with clear contracts and conditions	Poor job security and protection for workers in flexible employment arrangements	<ul style="list-style-type: none"> <li>Collaborate with local suppliers, NGOs and government agencies to expand formal employment opportunities, and promote equal access for girls and women.</li> <li>Set targets for sourcing from women-owned businesses and collaborate with them to continuously improve their operations.</li> <li>Limit, or even prohibit the use of informal workers or workers with flexible employment arrangements, such as "labour-only" contracting, sub-contracting, home-working arrangements, and apprenticeship schemes where there is no real intent to impart skills or provide regular employment.</li> </ul>
	Use of malicious recruitment agencies	<ul style="list-style-type: none"> <li>Only use certified recruitment agencies that adhere to your supplier codes of conduct and refrain from all kinds of practices that put men and women in harm's way in the recruitment process.</li> </ul>
	Outsourcing to informal suppliers	<ul style="list-style-type: none"> <li>Work closely with suppliers to constantly improve their operational efficiencies, effectiveness, and flexibility (to absorb fluctuations in demand), as well as profitability. This will limit to outsourcing to cheaper, and informal suppliers / contract workers.</li> </ul>
I Workers can own land and have access to safe natural resources	Destruction of living environments (farmland, villages, forests, rivers, lakes, etc.)	<ul style="list-style-type: none"> <li>Facilitate your suppliers to collect and dispose of plastics and other pollutants that threaten the quality and fertility of land for food crops and pasture for livestock, or that pollute water sources. In some contexts, this may have a disproportionate impact on women due to their gender-defined traditional roles, such as producing food crops, keeping small livestock, or collecting water and firewood.</li> <li>Provide financial incentives, such as a premium for produce from farmers who apply sustainable agriculture practices that meet consumer demand.</li> <li>Find alternative uses for your waste, for example by working with start-ups or creating your own spin-offs (e.g. recycle citrus waste for fragrant oil &amp; edible fibres, use coconut bark to create industrial pallets, recycle fibres of used clothing, recycle discarded fishing nets to create carpets, etc.). Recognise women as important stakeholders and actors in generating economic activities.</li> <li>Help (female) farmers to protect their land from degradation (e.g. by creating protective green borders).</li> </ul>

EXAMPLES OF SPECIFIC GENDER-RELATED MITIGATING MEASURES		
HUMAN RIGHTS PRINCIPLE	RISK CATEGORY	POSSIBLE INTERVENTIONS TO REDUCE THE LIKELIHOOD OF GENDER-RELATED RISKS OCCURRING, AND/OR THE IMPACT OF THESE RISKS
	Industries that monopolise or excessively use scarce resources	<ul style="list-style-type: none"> <li>Apply innovative procedures to limit natural resource usage and pollution (e.g. water-free and chemical-free textile dyeing by companies) by promoting recycling and reuse wherever possible. Make sure women participate in decision-making processes that affect their property and natural resources.</li> </ul>
	Displacement of locals from their land	<ul style="list-style-type: none"> <li>Only construct properties on land that is not claimed or owned by locals, or buy land at fair prices. Apply the right to free, prior and informed consent of communities, and make sure women's voices are being heard.</li> </ul>

### 5.3.2 RISK MITIGATION APPROACHES FOR EXTERNAL RISKS



Unlike preventable risks addressed in the previous section, you cannot prevent external events from occurring. Your mitigation efforts should therefore focus on identifying, designing, and testing responsive strategies. These may include stress tests and resiliency plans (such as the rapid deployment of assets and capabilities, reduction of working hours to save permanent jobs, and providing lines of credit to suppliers).

A focus on “women’s empowerment” and “build back better” can help enhance flexibility, innovation and competitiveness, both within your company, as well as your broader business relationships. It can also make you more resilient to the six types of external risks: political, social, economic, environmental, legal, and technological.

Below we give some examples of mitigating measures to counter some of these external risks.

#### MITIGATING ENVIRONMENTAL RISKS IN THE AGRICULTURAL SECTOR

Build the capacities of both men and women to increase yields, as well as the quality and variety of crops and livestock, while strengthening resistance to pests and diseases. Focus not only on women’s agency, but also encourage men to collaborate with their wives as equal partners in male-dominated activities, such as cash crop farming. Explore socio-cultural practices that prevent the equal participation of men and women in managing economic resources.

Facilitate and stimulate women to set-up saving groups (VSLAs) to help them to save money, and access credit to cushion them when crops fail. Ensure that each element of the VSLA model not only enhances women’s livelihoods, but also their confidence and resilience. Also explore ways to link women’s groups to local governance, and child protection.

Put aside sufficient economic capital (equity) to cover any unplanned crop losses for your suppliers (for example due to an extended monsoon period), according to your own standard of solvency (which is based on your ideal debt rating).



### MITIGATING SOCIAL RISKS DUE TO FOR EXAMPLE THE COVID-19 HEALTH CRISIS THROUGH A 'BUILD BACK BETTER' APPROACH

- As CEOs and executive teams, publicly signal your commitment to advance gender equality, particularly during the ongoing COVID-19 pandemic, by signing the CEO Statement of Support for the Women's Empowerment Principles.
- Honour existing contracts with your suppliers and with women-owned businesses, support their recovery, and engage them as supply chains are re-established.
- Invest in the support of micro- small- and medium-sized enterprises within the value chains of large companies, which is crucial to protect and create jobs and preserve learning opportunities in local communities.
- Work together with NGOs, women's rights organisations, local communities, governments, educators, and other businesses, to advocate and encourage policies that are effective in supporting the most vulnerable during and after a pandemic.
- Listen to women's voices and ensure their representation and inclusion in all planning and decision-making processes, specifically with COVID-19 related policies and responses. Remember that social dialogue is key in strengthening environmental, social, and governance standards. Ensure that production locations engage with trade unions, worker's representatives, and other rights holders, to jointly discuss the measures that need to be taken.
- Provide flexible working arrangements, as well as paid sick, family and emergency leave for parents and caretakers, keeping in mind that the majority of unpaid care work falls to women.
- Support employment and income protection for women across the value chain (for example through maintaining wage payments during the crisis).
- Use the pandemic to trigger more out-of-the-box thinking to offer new products, services and solutions, including those that are accessible and affordable to vulnerable populations.
- Help address the unintended consequences of stay-at-home measures, including the alarming increase in domestic violence. Support, and direct employees to domestic violence hotlines and other social services.
- Ensure access to quality healthcare for women and girls, especially as resources are diverted to address the pandemic.
- Help challenge gender norms through marketing and advertising, encouraging unpaid care to be shared more equally.
- Collect disaggregated data, for example gender and age, to track the impact of all response efforts.

Source: <https://businessfightspoverty.org/articles/from-response-to-rebuilding-better/> and <https://www.unglobalcompact.org/take-action/20th-anniversary-campaign/uniting-business-to-tackle-COVID-19/genderequality>

## PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN PRACTICE, SEE THE REPORT, PART 2.





## STEP 4: TRACK PROGRESS ON GENDER EQUALITY



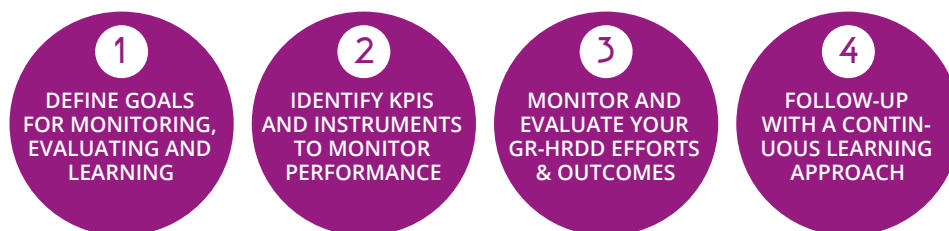
Achieving gender equality, empowering women and profiting from it, is a long-term effort that requires stamina, learning from past mistakes, leveraging proven good practices, constant fine-tuning, and keeping internal and external stakeholders well informed and actively engaged.

This requires that you monitor your implementation efforts, your actual short, medium and long-term progress, as well as unexpected hurdles you may have faced. A well-planned and reflective monitoring and learning approach can go long way in helping you track the change process in a meaningful way.

Based on these insights you can evaluate on one hand your GR-HRDD approach and on the other hand the policies defined, and the actual risk mitigating measures and grievances received, and remedies provided. This provides the ingredients for learning and continuous improvements.

The insights, learnings and improvement plans can be used in communicating and engaging with (female) rights holders, women's organisations, your staff and managers responsible for implementing your gender policy, unions, NGOs, and other relevant actors. This helps to create a culture and atmosphere of trust, commitment and can-do mentality, and to mobilise additional resources or personal energy where needed.

The following sections outline four essential elements in effectively monitoring, evaluating, and learning from your GR-HRDD processes.



### 5.4.1 DEFINE CLEAR GOALS FOR MONITORING, EVALUATING AND LEARNING



To ensure that your employees, suppliers, and other relevant actors are committed to monitoring, evaluating, and learning from your GR-HRDD processes, you need to start with a clear rationale for WHY the company wants, and needs to do this. These reasons WHY monitoring and learning is needed are that it helps you to are:

1. Generate internal input for better policy making, steering, governance, and decision making. It also helps ensure that you are allocating the budget and human resources required to reach your GR-HRDD targets.
2. Make more effective investments that meet, or exceed, initial business targets.
3. Increase the outcomes and credibility of your policies.
4. Be transparent and accountable towards your shareholders, consumers, customers, lenders, donors, and other stakeholders, and work towards improving these relationships.
5. Feed your marketing strategy with valuable GR-HRDD achievements and messages.

## 5.4.2 IDENTIFY KPIS AND RELATED MEASUREMENT TOOLS TO MONITOR PERFORMANCE



To effectively and efficiently monitor your GR-HRDD efforts like any change process, it is advisable to focus on a few specific areas with a limited set of key performance indicators (KPIs). These should be linked to clear targets and monitoring tools that can help you assess your progress, and communicate this through your internal and external reporting processes.

When developing company-specific indicators to track and report on progress towards your GR-HRDD targets, there are four broad types of categories for which you need to define KPIs:

- policies & processes
- awareness & competencies
- outcomes & impacts, and
- actual incidents

The next table provides examples of KPIs for each of these four categories, with their related indicators, and data sources.

EXAMPLES OF PERFORMANCE MONITORING KPIS AND INSTRUMENTS		
GR-HRDD PERFORMANCE AREAS	EXAMPLES OF KPIS & ASSOCIATED INDICATORS	MEASUREMENT TOOLS & DATA SOURCES
<p><b>I. Policies and processes (as part of the six steps of your GR-HRDD) that promote gender equality and address prominent gender-specific human rights issues</b></p>	<p>a % coverage of the GR-HRDD approach by well-documented and by management endorsed policies, risk management processes, grievance mechanisms, etc</p> <p>b % of gender-specific risks for which root causes are identified and documented and accepted by key stakeholders</p> <p>c % of gender-specific risks of which the likelihood of occurrence and/or their impact has been reduced</p> <p>d # of gender-specific risk and impact indicators defined and included in audits and analysed</p> <p>e # of stakeholders informed on gender equality policies, activities and results achieved</p> <p>f % of reported incidents that have been remedied satisfactorily for affected parties</p>	<ul style="list-style-type: none"> <li>• Interviews</li> <li>• Document reviews</li> <li>• Social audits</li> <li>• Stakeholder consultations</li> <li>• Country reports</li> </ul>
<p><b>II. Awareness, competencies &amp; beliefs of managers &amp; workers across your supply chain of your GR-HRDD policies, processes &amp; mechanisms</b></p>	<ul style="list-style-type: none"> <li>• Rating by management and staff (on a 1 to 10 scale) of their understanding &amp; acceptance of gender-related human rights policies, processes, etc</li> <li>• % of management &amp; workers (identified as playing a key role in the process) trained in all aspects of GR-HRDD and good practices to achieve gender equality (by making use of this tool for example)</li> <li>• % women and men who are convinced that gender equality must be achieved and is beneficial and valuable for all.</li> </ul>	<ul style="list-style-type: none"> <li>• Employee satisfaction surveys</li> <li>• Field / on-site visits</li> <li>• Interviews</li> <li>• Workshops</li> </ul>

EXAMPLES OF PERFORMANCE MONITORING KPIS AND INSTRUMENTS		
GR-HRDD PERFORMANCE AREAS	EXAMPLES OF KPIS & ASSOCIATED INDICATORS	MEASUREMENT TOOLS & DATA SOURCES
<p><b>III. Outcomes of your GR-HRDD efforts to drive positive impact for workers of all gender identities (related to the nine human rights principles)</b></p>	<p>1 Ratio of women / men in management positions            2 % women who get paid at least the living wage level            3 % women who work reasonable hours at decent conditions            4 # of women in forced labour situations in the company            5 # women who experience less or no harassment &amp; abuse            6 % women who feel that health &amp; well-being needs are adequately addressed            7 # female members &amp; leaders of producer associations, unions, and workers' councils            8 % women with employment contracts that safeguard wages, benefits, hours, and working conditions            9 % women who can own land, and have access to safe natural resources</p>	<ul style="list-style-type: none"> <li>• HR records</li> <li>• Internal audits</li> <li>• Employee satisfaction surveys</li> <li>• Field / on-site visits</li> <li>• Grievance mechanisms</li> <li>• Focus group discussions</li> <li>• Self-assessments</li> <li>• Stakeholder consultations</li> </ul>
<p><b>IV. Incidents related to the nine human rights principles</b></p>	<ul style="list-style-type: none"> <li>• # of actual incidents related to the nine human rights principles that happen despite your GR-HRDD efforts (based on the complaints received)</li> </ul>	<ul style="list-style-type: none"> <li>• Grievance mechanisms</li> <li>• Employee surveys</li> <li>• Field / on-site visits</li> </ul>

For each KPI, it is also important to think about the measurement tools that you will use to gather data. Identify tools that are most easily accessible in your context, while providing you with credible results. For example, simple surveys may not sufficiently capture whether “women feel that health & well-being needs are adequately addressed.” Interviews and workshops might be needed as well.

A common **pitfall** you should, and can, avoid is to focus on monitoring what **can** be measured, rather than what is **truly important** to monitor. The monitoring of human rights progress (beyond issues related to health and safety) is still a relatively under-developed field. This is even more true of gender-specific human rights. For most companies, there is insufficient experience and guidance on how to effectively measure their progress on human rights due diligence. It is not surprising, therefore, that most progress reports draw on easily available (quantitative) data. Unfortunately, this does not provide sufficient insights on most GR-HRDD targets, and the related KPIS outlined above. To bridge this gap, it is essential to undertake supplementary field- and case studies, and gather anecdotal evidence from those affected by gender-related human rights abuses. It also follows that you should not spend valuable time and scarce resources to monitor activities that cannot provide you with useful insights on your KPIS, “simply because you have the data.” Examples of less-useful information could be the number of training sessions conducted, the ratio of women in office versus factory functions, and so on.

### 5.4.3 MONITOR AND EVALUATE YOUR GR-HRDD EFFORTS AND OUTCOMES



Once you have identified your KPIS and the relevant data sources (see Step 2, 5.2.2.), actual monitoring can commence.

There are **many types of monitoring and evaluation (M&E) instruments** you can apply. We strongly advise you to use the same tools used in your human rights due diligence, or responsible business conduct (IRBC) efforts (if they suffice). If you are not doing so already, consider using the following (complementary) instruments.

The first instrument is **periodic unannounced third-party reviews/ (social) audits** of your own operations as well as those of your suppliers. As with other M&E instruments, it is essential to

consult with, and engage impacted, or potentially impacted rights holders, including workers, workers' representatives, and trade unions. Audits should be done on a regular basis, by your own on-site audit teams. Such teams will have a good understanding of the scope of your labour, environment, and health and safety standards, as well as being familiar with the local languages, laws, culture, and business context in your countries of operation. Audits that are an integral part of certification schemes such as the one from the [Rainforest Alliance](#) (for the agri-sector) and which pay attention to gender-specific human rights risks can be applied in the context of GR-HRDD. Third-party audits performed by independent auditors can take a deep dive. With the information collected, companies become aware of what is happening in their company, or at the level of their supplier (being it a factory, cooperative, etc.) and how things have changed for the better.

In parallel with (social) audits, we suggest employing **self-assessments**. This ensures that your business unit managers, site managers, suppliers, and so on, are responsible for, and own the assessment and subsequent improvement processes. It also means that each of these actors will be more likely to develop their policies, processes, competencies, etc. to improve human rights compliance and gender equality without constant pressure from head office, customers, or other parties. As a global company, you can of course help your business associates to develop or even conduct such self-assessments, for example by providing training to your suppliers. One thing to bear in mind is that the ownership and management of most supply companies is likely to be male dominated, which might contribute to a gender-blind assessment. It is therefore essential to encourage dialogue between your suppliers and female workers, and ensure their equal participation and representation in the assessment process.

Another M&E instrument is the **periodic review of suppliers' self-assessment reports**. This enables you to verify that appropriate risk mitigation measures are being pursued, or that adverse impacts have actually been prevented or mitigated. Such reviews also provide you with insights on how your business relationship influences your overall GR-HRDD efforts.

One of the benefits of the digital revolution is that it has opened up access to a multitude of online-based, and accessible M&E instruments. Tapping into the increased use of **artificial intelligence, block chain, crowd-auditing, drones, and satellites**, they offer more efficient, augmented, or even new insights into global supply chains. We are yet to harness the full potential of these technologies to enhance human rights due diligence. Drones, for example, are not only useful in predicting harvests, thus helping farmers secure more income, but they could support the monitoring of human rights issues in large plantations, and at critical points along global supply chains. Satellite images can help to monitor those involved in unsustainable practices such as illegal logging, hence supporting companies to exclude them from their supplier short lists. Similarly, block chain technology increases product and payment traceability, thus contributing to more transparent audits, and monitoring of global companies. In collaboration with [Fairfood](#), for example, the Dutch company Verstegen Spices & Sauces uses block chain technology to increase transparency along its nutmeg production chain transparent. As a result, farmers are able to strengthen their bargaining power, while consumers gain more insights into social and environmental costs involved in producing the spices they buy in their local supermarket. Other innovators are piloting the use of block chain technology to make financial services more easily available to women, and marginalised communities. Some social enterprises already use QR codes to empower communities and allow consumers to be part of a real-time check on wages. All these new and exciting trends might create new opportunities to monitor your risks with a gender lens and/ or identify specific gender risks.

Ultimately, the **monitoring process itself must be gender inclusive**. Simply soliciting information without ensuring that the input gathered is complete, unbiased, and accurate, can lead to incomplete or faulty conclusions. This, in turn, will likely undermine any response measures based on such data. To ensure that M&E is conducted effectively and efficiently and provides

you with truthful insights, please take into account the following **learnings**<sup>1</sup> for each of the M&E instruments described above, many of which are drawn from an analysis of nearly 17,000 supplier audits by Harvard Business School in 2016:

#### Pay attention to the specifics of the target audience of M&E efforts

1. Ensure that the **interview sample** of workers, suppliers, and local community members **includes both men and women**. Also consider how a respondent's gender will affect the answers given, and/or potentially mask problems.
2. Take into consideration the **low literacy levels of female workers** working in manual, or low-skilled tasks, and the attendant lack of **awareness** of their labour rights.
3. **Look beyond identifying gender-based harassment and discrimination in the workplace**. Investigate if, and how, men and women face different experiences of gender-based harassment and discrimination in the community and at home.
4. Bear in mind **cultural norms and beliefs** that contribute to subordinate roles of women in many societies.

#### Involve experienced and independent M&E teams

5. A social auditor must be **competent and gender sensitive**. A problem frequently associated with (social) audit processes, is that they tend to focus on documenting existing labour problems without examining why these problems exist and how they can be resolved.
6. Work with **gender-balanced monitoring teams**. This helps to bring the necessary skills to the table to identify subtle, or endemic, gender-based discrimination. It also facilitates the consultative process: for example, female workers may prefer talking to a woman about their working conditions, or experience of gender-based discrimination or violence. Male factory owners or managers, on the other hand, may be more willing to share data and thoughts with male auditors or staff from the global company.
7. **Ensure that auditors are independent**. If the audit company is also involved in financial audits and/or advisory activities, it might be heavily influenced by business interests and it might hesitate to present truly damaging information, based on a desire to maintain good relations and to receive future work.
8. For sensitive issues, be aware that **the influence of the data collector** may affect the credibility of the results. Monitoring teams might report fewer violations when individual auditors have visited the factory before, when audit teams are less experienced or insufficiently trained, when audit teams are all-male, and when audits are paid for by the audited supplier.
9. Ensure that the auditor is **truly independent** of local management, and communicate this to your workers. Social auditors are often associated with factory management and hence lack the trust of workers since interviews often held inside the factory where managers know exactly who is being interviewed, for how long and on what issues. Managers may even instruct workers on what to tell the auditors, making staff afraid to speak freely.
10. If you choose to appoint an independent (social) auditor to carry out the monitoring on your behalf, ensure their organisation has **experience** in gathering in-depth insights, as well as facilitating discussions around gender equity issues in the field. Make sure the auditors have a record of undertaking independent, competent, and accountable research.
11. **Collaborate** with civil society, members of the affected community, feminist / women's rights organisations, and relevant workers' associations at local, national and international level, as well as with government authorities. This will make it easier to gain a balanced understanding of gender norms and women's roles in society, and how this will affect their experience during the monitoring process.
12. Ensure there are **safeguards** in place for your monitoring teams, especially if they have to carry out fieldwork.

1 [http://www.hbs.edu/faculty/Publication\\_Files/ShortToffelHugill2016SMJ\\_4746e9b3-c482-4d09-b5aa-f2861fd1010f.pdf](http://www.hbs.edu/faculty/Publication_Files/ShortToffelHugill2016SMJ_4746e9b3-c482-4d09-b5aa-f2861fd1010f.pdf) and [www.researchgate.net/publication/341882315\\_The\\_Business\\_Social\\_Compliance\\_Initiative\\_BSCI\\_A\\_Critical\\_Perspective\\_Clean\\_Clothes\\_Campaign](http://www.researchgate.net/publication/341882315_The_Business_Social_Compliance_Initiative_BSCI_A_Critical_Perspective_Clean_Clothes_Campaign) and <https://www.p-plus.nl/nl/nieuws/social-audits-manschot>

### Apply proven monitoring methods

13. If your company participates in a **multi-stakeholder initiative** that has its own processes and methods (and often also grievance mechanisms), you can use such information to verify your company's own monitoring efforts, and (GR)-HRDD outcomes. Examples include the [IRBC Agreement in The Netherlands](#), [RSPO](#), [Fair Wear](#).
14. **Use existing and proven monitoring questions** such as those provided by [BSR](#), while also taking care to ensure that the specificities of your business context are sufficiently covered in the ultimate questionnaires.
15. However, be aware that some international social auditing standards do not allow you, or the audit companies accredited for a specific standard, to add specific questions and nuances to the questionnaire. Therefore, it might be necessary to **collect additional information independent of these social audits**.
16. Do not assume that a supplier has all the required data available, and be aware that you and your supplier may thus have to **spend more time collecting the data**. This is also due to the fact that many (especially SME) suppliers may **lack the data** (or only have a paper-based administration), or **be unwilling to share their data**. Moreover, most of the required gender-disaggregated data (both quantitative and qualitative) is often not recorded, or privacy laws may limit opportunities to capture and store personal data. In addition, the data required for social audits tends to be rather complex when compared to human rights issues such as child labour for which data (e.g. age of employees) is easier to find.
17. Respect respondents' right to privacy by considering **anonymous data collection methods** as well as anonymity when publishing results.
18. Hold **separate in-depth focus group discussions, interviews, and self-assessments for women and men**. This helps to ensure that the voice of impacted individuals or groups is adequately represented. There are NGOs that support companies in facilitating a dialogue by using various participatory techniques to assess life and job satisfaction, which is especially useful where there are high illiteracy rates among respondents. Gathering personal stories is another useful tool. An added advantage of storytelling is that it can strengthen your external communications strategy by demonstrating your commitment to listen to diverse voices.
19. Demand findings that are **disaggregated by sex**, and which adequately explain how the human rights issues identified affect men and women differently.
20. Ensure that you can **signpost** existing social and support services for women (and men) experiencing violence, in case this is revealed during the in-depth interviews.

Even though social audits of suppliers that are mandated by a global brand can provide valuable insights there are a few issues to bear in mind to ensure their **effectiveness**, as outlined in the box below.



#### REMARKS RELATED TO (SOCIAL) AUDITS OF SUPPLIERS BY A GLOBAL BRAND

As a (global) brand, it is important to bear the following issues in mind to ensure that your social audit generate useful (gender-specific and rights-based) information on issues such as freedom of association, non-discrimination, wages & working hours, and non-harassment.

First, the **purchasing policy and practices of the global company** have a major influence on the supplier's business operations and employee rights. In most cases, this purchasing policy is not taken into account during a social audit. Hence the focus tends to be on the supplier's business operations, and not that of their buyers. According to research by the ILO, in more than 75% of cases, buyers are not prepared to pay more for a product if it guarantees the minimum wage of the employees. An audit, on the other hand, checks whether suppliers pay their employees the minimum wage. Those two things cannot be reconciled.

Secondly, and related issue, is the **unequal relationship between suppliers and (global) buyers**. Suppliers must meet strict requirements from brands in order to "be allowed" to deliver a product. They are given very little room to negotiate about details such as deadlines and prices. In many cases, buyers also fail to honour the contractually agreed deadlines, while this is (conversely) expected of the supplier. In the fashion world, for example, it often happens that the buyer is late in delivering a design, yet does not allow postponement of the original deadline for the supplier. In the workplace, this leads to excessive overtime and private contracts with additional subcontractors who may not be included in social audits, leading to a rise in human rights abuses.

And finally, a standardised social audit process may not be sufficient to pinpoint actual abuses. By asking the same questions in every industry, country and site, an audit leaves little room for context-specific solutions. In addition, suppliers who take a particularly good, sustainable or inclusive approach do not stand out, but "simply" meet the requirements. Audits therefore do not help to challenge (and reward) suppliers who handle their business operations better than others. Audits can therefore be seen as facilitating a "**race to the bottom**" rather than a **race to the top.**"

#### 5.4.4 FOLLOW-UP M&E RESULTS WITH A CONTINUOUS LEARNING APPROACH



The next step in your monitoring process is to **analyse the evidence** amassed and **draw lessons and insights** for improving your GR-HRDD processes. These can feed into your policies, where needed, to strengthen future risk and impact assessments, and also identify and prioritise short- to long-term actions to further strengthen your GR-HRDD efforts.

Some specific tasks at this stage include reflecting on: broader gender norms and principles, and the extent to which your risk mitigation measures align to these; and how the company's practices impact different gender identities differently, and what this means for your corporate culture and brand. This (joint) reflective process can help executives and staff to gradually improve on weak points identified during the M&E process.

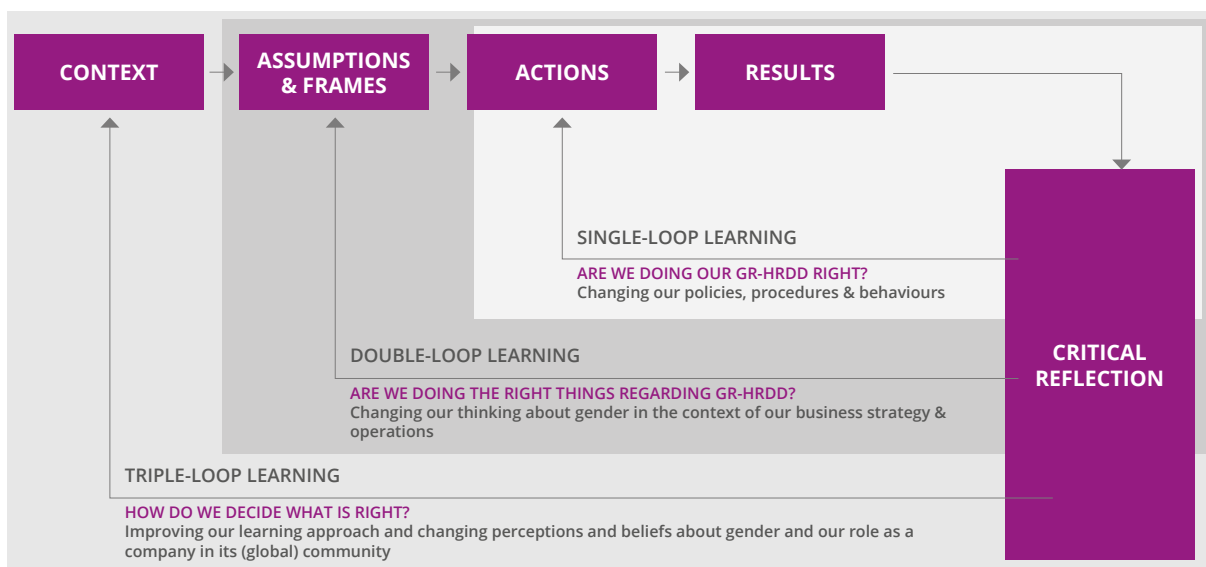
In order to make the most of your past experience, it is necessary to embed a continuous learning approach in your GR-HRDD processes. This may include conducting such activities as training workshops, "gender cafés," mentoring, and market analysis, to help staff can reflect on gender equality issues at both the personal and company level.

To maximise your learning opportunities and stimulate truly transformative improvements that involve changes in values, norms and beliefs, your learning approach should include the following three levels of learning, each with its own questions:

- **Single-loop learning:** Are we doing our GR-HRDD right? Do we take the right actions? The answers to these questions might result in changes in policies, procedures and behaviours.
- **Double-loop learning:** Are we doing the right things with regard to our GR-HRDD processes? Do we take the right actions and apply the right assumptions and frames? The answers might lead to changes in how you think about gender in the context of your business strategy and operations, and this will help you to address many root causes related to culture, norms, values and behaviours.

- **Triple-loop learning:** How do we decide what is right? Do we take the right actions, apply the right assumptions and frames, do we learn the right things, and do we understand our context right? The answers might result in changes in your learning approach itself, and/or perceptions and beliefs about gender, and/or your role in the communities that you operate in.

### The continuous learning approach in the context of GR-HRDD



An example of a double-loop learning is included in the table below. It demonstrates that even well-intended policies may not work as planned if the full (gender-specific) context is not taken into appropriate consideration (triple-loop learning).

#### WHAT HAPPENS IF YOU DON'T EXPLICITLY ADDRESS GENDER IN YOUR BUSINESS CONDUCT? AN EXAMPLE FROM THE SOY SECTOR

A company wants to provide equal opportunities for women in its soy supply chain. It implements an initiative promoting the hiring of more women to work in soy crushing mills. The company policy explicitly states that women shall be employed on the same contractual basis as men, paid the same wages, and protected from workplace harassment.

However, the company does not hold prior consultations with local women's organisations to understand their perspectives on these policies. Due to discriminatory cultural gender norms, women are expected to perform all household tasks in addition to cultivating crops for their families' consumption. The company is also unaware of previous incidents of sexual harassment from the (exclusively) male supervisors tasked with implementing the initiative.

Consequently, despite their interest in securing employment, local women are slow to take up the offer. When fewer women than expected apply, the company assumes there is insufficient interest from women and does not investigate the possible causes in more detail. It therefore misses out on an opportunity to make a real difference in the lives of women in the community.

Source: [Addressing gender considerations in the soy supply chain: tackling gender inequality through responsible sourcing. Soy Toolkit version 1.0](#)

In addition to promoting learning within your own organisation, we recommend that you make efforts to stimulate, and facilitate, a **continuous learning approach** between your suppliers and your own company. The aim is to support your suppliers to meet the standards you have set for your business as a whole. To help make this a reality, it may be wise to jointly establish milestones to improve suppliers' business practices, and to commit and contribute to continuous improvement in their operations. This not only helps them to achieve your gender equality goals, but also avoids business-related sanctions to the supplier, such as delisting due to an inability to meet GR-HRDD targets.

Ultimately, an effective continuous improvement approach should deliver the following fundamental guiding principles:

- Have a positive impact on people, communities, and the planet.
- Contribute to creating shared value with your suppliers and other stakeholders.
- Continuously improve practices along the supply chain to achieve your target standards.

## PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN PRACTICE, SEE THE REPORT, PART 2.





## STEP 5: COMMUNICATE HOW IMPACTS ARE ADDRESSED



At this point in your GR-HRDD journey, you have carefully assessed your business environment for any gender-related human rights risks, developed policies and work plans to address and mitigate such risks, and began implementation. The first audits of your efforts reveal generally satisfactory results, although work is needed in some areas.

But this is not the end of your due diligence. Communication in the context of GR-HRDD enables you to inform and engage your female rights holders, relevant unions, women's organisations, unions and NGOs involved, as well as your consumers and shareholders. You can inform them about what drives you, your gender-equality ambitions, steps you are taking as well as your progress, what dilemmas you are confronted with, and how you plan to address any gaps, or emerging risks. Furthermore, your company's corporate communications and branding offer a crucial platform to showcase your commitment to gender equality, and breaking gender stereotypes. This helps to create a culture of trust, commitment, and joint ambition.

Especially with communication to inform, engage and commit your stakeholders, you should not wait until you have tangible results to show. Rather, communication to achieve these goals commences the minute you start thinking about the relevance of gender-equality and reinforces all your efforts during the different steps of GR-HRDD.

Transparent communication should, however, be much more than demonstrating the availability of information, policy, risks, or reports. Transparency in and of itself does not ensure that the company embraces ethical and sustainable business practices. It is an important step though.

Good communication also involves being willing to become more open with your stakeholders. This is essential in launching a genuine dialogue with them, for which you will also reap the benefits of letting them think along with your company. Such social sensitivity adds to your company's value and legitimacy, and promotes accountability. By demonstrating your (positive) impact on gender equality, the broader society, as well as the environment, you can forge stronger relationships with your clients, employees, members of the local communities you operate in, suppliers, shareholders, and other external stakeholders.

Finally, effective communication does not emerge in a vacuum. To ensure that your outreach to diverse stakeholders is not only authentic, but of high-quality, it is important to fully undertake all the previous steps in the due diligence process. Embedding your corporate and brand communications in a rigorous GR-HRDD process helps deliver the empirical evidence you need to convince, and engage this broader public.

To design and execute an effective and efficient communication approach within the context of GR-HRDD, the following three specific topics might be taken into consideration.



### 5.5.1 AUDIENCES, COMMUNICATION GOALS AND MESSAGES



To define a workable communication strategy, you should be as clear as possible on **who** you would like to communicate with, and what you want them to **know, believe** and **do**. In other words, define your communication goals.

One goal might be to **raise awareness and engage** your workforce in enacting gender-responsive policies and actions. A good communication strategy will instil pride in employees about their company's record on gender issues. You may also want to **trigger direct changes** in behaviour within your own organisation or in the operations of your suppliers.

Your communication strategy could be driven by the need to gradually **alter public perceptions** about your company and how it exercises GR-HRDD. Or you may want to **challenge** commonly held **gender norms** about what behaviour is acceptable or typical.

Last but not least, by communicating proactively, you create chances to **tell your own story, instead of reacting** once questions about your practices have been raised in the media.

As a global company, it goes without saying that you should be adhering to labour standards at industry, country, and international level. This not only helps with your branding, it also provides you with added **leverage to stimulate broader changes** across your supply chain and **industry** as a whole. By publicly stating, for example, that everyone is entitled to a safe workplace and that this attitude is also in your own business interest, you can expose workers, suppliers, and their broader social networks, to a different view. This will help create a counter-narrative that a focus on gender equity has far-reaching benefits. An example of how to use your "soft" power is advocating for the ratification of [Convention 190](#) on violence and harassment in the world of work.

#### COMPANIES COMMITTED TO AND PROACTIVELY CAMPAIGNING FOR THE ILO CONVENTION 190

In 2018, one year after the global rise of the #METOO movement, the founding members of the "OneInThreeWomen" network (FACE Foundation, the Kering Foundation, Korian, L'Oréal, BNP Paribas, Carrefour, SNCF and Lagardère) called other companies to join this movement to include this new topic in their corporate social responsibility policies. The objective was to work with specialised organisations to create, and pilot, interventions to fight violence against women through providing effective support to victims amongst their employees. The partners subsequently developed the [OneInThreeWomen](#) inter-company programme to combat violence inflicted on women in Europe.

The coalition has publicly supported the United Nations [Convention on the Elimination of Violence and Harassment in the World of Work](#), which was adopted in June 2019.

In France, L'Oréal has created [#StOpE](#), a joint commitment by 30 companies to fight against casual sexism within companies through a focus on communication and training geared towards addressing serious gender-related risks.

Below we highlight examples of specific goals that companies can use to achieve the aforementioned goals for each of the following six audiences: employees, customers, suppliers and peers, shareholders and lenders, local and national governments, and NGOs.

#### **A Employees, other workers and their representatives in Worker Committees and Unions**

Your internal communication on GR-HRDD informs your staff (including potential and new hires) about: your gender-specific policy, and related implementation plan; progress towards implementing the plan; as well as any risks identified and how they have been dealt with. Since communicating about how you are addressing risk is so critical in managing your company reputation, it is essential that all your internal stakeholders "are on the same page". This can be done by giving them access to empirical data on how the company, among others: ceased or avoided risks, grievances that have come to the company's attention, remedies to rights holders provided, and measures taken against wrongdoers, and additional improvements in your policies and operational business practices.

Your communication should not only provide hard evidence, it can “touch the heart” of staff by helping them better understand why gender equality is worth striving for, and that it can be achieved by complying with your policies. Staff will be further motivated if they know that your GR-HRDD efforts are moving in the right direction, and that their opinions and contributions truly matter.

Ultimately, your efforts should aim to instil sustainable change amongst your workers and managers by challenging their own ideas about gender, the benefits of gender equality, and their norms about what behaviour is acceptable.

## **B Customers**

Your company probably serves a broad range of customers, with many different expectations about responsible business conduct in general, and gender equality in particular. Amongst them, you will no doubt encounter a mix of perspectives on gender equality, ranging from ‘innovators’ who initiate societal change and actively demand and promote gender transformative behaviour with the private sector, the ‘early adopters’ who value gender-equality and take your progress and authentic ambitions at heart when making purchasing decisions, and the ‘early majority’ who think that gender-equality matters but may not treat it as a critical buying criterium.

Not all customers – and certainly not the “laggards” – will be genuinely interested in the ins and outs of your GR-HRDD approach. But you are more likely to gain their attention if your communication is the open, sincere, and compelling. For example by providing thought-provoking information and stories about the positive effect that your focus on human rights and in particular gender, has had on women. Late majority and laggard groups are also susceptible to news and stories on (social) media. You might therefore need to proactively address any misconceptions spread through these channels about your company’s contribution to gender diversity and women’s empowerment.

By gaining their trust, you may ensure customers’ willingness to buy from you (perhaps even at a premium price if this is part of your marketing strategy). This is also likely to increase their Customer Lifetime Value (CLV), and raise their willingness to promote your brand and products and services amongst their peers.

## **C Suppliers & peers**

As part of your gender equality policy and your GR-HRDD efforts, you will most certainly also want to stimulate your suppliers to do their part to realise your ambitions.

Your communication with suppliers should focus on what your gender equality policies, and the resulting supplier codes of conduct, mean for your suppliers. You can highlight how living up to them not only safeguards their position as your supplier, but also strengthens their competitive power amongst peers. You will also want to inspire them with information about how you have shaped your GR-HRDD efforts, as well as the gender-specific risks you are addressing, and specific mitigating measures taken. Moreover, your communications can help raise their awareness on their own role in identifying gender-related human rights risks in their own context, as well as their mitigating measures. You can further indicate how you will validate their efforts, for example with social audits.

Another possible angle in your communications is to expose suppliers to a different view, and hence create a counter-narrative on typical negative gender norms and values. One way of doing this is to state that everyone, independent of gender identity, is entitled to a safe workplace, and that this attitude is also in your own business interest. In short, you can positively influence your supply chain, and the industry as a whole, to improve business practices with respect to gender responsiveness.

## **D Shareholders & lenders**

Your entry point in talking to shareholders and lenders – who may not yet be convinced that gender equality makes business sense – is to provide them with a solid case to support your investments in GR-HRDD. In particular, you will want to highlight how investing in gender equality helps improve your company’s top- and bottom-lines, as well as its competitiveness and innovativeness.

Luckily, a steadily growing number of your more progressive shareholders or lenders may already be ahead of the curve, and even demand that you to embrace the principles of responsible business conduct (with an integrated focus on people, planet and profit), while respecting (gender-specific) human rights. You want to let these supportive investors and lenders know that your company is truly contributing to empowering women, and hence achieving the required returns on investment in relation to gender equality and inclusion. Your communication should also demonstrate how this will ultimately contribute to your company's sustainable financial performance, and enhance the value of your brand. This should, hopefully, trigger them to invest (more) in your company, or to offer you credit on more favourable terms.

### E Local, and national government

As you strive to comply with (international) laws and regulations that have been endorsed by national governments, it is also important to bear in mind that governments work for their constituents and should thus facilitate the positive changes society wants to achieve. It is therefore crucial to look beyond strict adherence to specific human rights legislation and to listen to citizen voices, such as the #MeToo and BlackLivesMatter movements, or growing calls to embrace gender diversity.

Your GR-HRDD reporting efforts should similarly seek to confirm that you not only comply with (international) laws and reporting standards (e.g. the Global Reporting Initiative standards for large enterprises), but that you are intrinsically committed to achieving gender equality, and reducing gender-related human rights risks.

Other communication objectives could include portraying positive examples from the business sector, challenging (low) government ambitions, or overturning gender stereotypes and biases. While such a “transformative” push from private enterprises is still rather limited, this does not diminish its importance. You can stimulate governments to create a level-playing field by not only making human right due diligence mandatory, but to do so in a gender-responsive way right from the start.

Another entry point in boosting GR-HRDD in your industry is to support your suppliers to reiterate that gender equality matters in their conversations with local governments.

### F NGOs

In communicating with NGOs in your sector – and broader civil society as a whole – your focus will be on informing them about your GR-HRDD plans, implementation progress and results, and persistent challenges faced with which they might be able to offer support.

It also helps to instil a level of trust in your company that will result in a more positive portrayal of your company among NGOs, both in private as well as in public. This will help strengthen your brand reputation and brand recognition.

All this calls for constructive engagement with these broader societal actors, based on the recognition that they can help you generate new ideas, ensure continuous learning, and build momentum for improving your policies and operational business practices in the long term.

## 5.5.2 THE TONE OF YOUR COMMUNICATION



Not only the content, but the tone of your visual, verbal, and written communication expresses what your company really thinks about gender-based human rights. A picture showing the diversity of your employees, for example, can help communicate that your company embraces people with different identities, and that typical gender biases do not apply.

As part of your GR-HRDD, it is essential to ensure that you are using **gender-sensitive language** in all your communications, as highlighted by [UNICEF, for example](#). This covers the inclusive use of language and visuals, as well as representation of male and female employees and other stakeholders to highlight that the company ensures they are equally represented, have equal access to resources and opportunities, enjoy balanced roles and have an equal share in decision-making.



In practice, gender-sensitive communication boils down to, among others: ensuring an **inclusive approach** in all kinds of communications; equally representing different gender identities in your audio-visual materials; and not defining women and men through their gender roles alone; and preventing depictions of women and men as objects of violence and sexuality.

In addition to this, and irrespective of your company's communication goals, your stakeholders want your communication to be clear, honest, relevant, and timely. It also helps if your information is **credible, adequate, representative and easily accessible**.

Gender-responsive communications are an integral part of the **7 Ps of your communication and marketing strategy**. This is a practical framework that can help you formulate and frame your gender-sensitive messages as exemplified in the table below.

GENDER-SENSITIVE MESSAGES RELATED TO THE 7 PS OF MARKETING	
<b>Product</b>	Our products are invented, created, and distributed by a balanced mix of people from all gender identities to best meet the needs of our gender-diverse customer base.
<b>Price</b>	Our prices are fair and based on (at least) living wages for men and women, and a just distribution of income and wealth across the hierarchical levels.
<b>Place</b>	The places we operate in are safe, and do not harm our female staff, or their surroundings (through adverse impacts on, among others, climate, different forms of pollution, land rights, or extraction of natural resources).
<b>Promotion</b>	Our promotions help to share our inclusive approach and we represent people of different gender identities equally in all verbal, written and visual communications. We avoid defining women and men through their stereotype gender roles, and we avoid presenting women and men as objects of violence and sexuality. The stories we tell of our positive impact on people with different gender identities are true and representative.
<b>Physical evidence</b>	In all our physical and digital locations for production, distribution, promotion, sales, and consumption of our products and services, we treat people of different gender identities as fully equal.
<b>People</b>	All the people we work with to fulfil our customers' needs are treated decently and fairly, and have ample opportunities to improve their lives, independent of their gender identity.
<b>Process</b>	In all our processes for production, distribution, promotion, sales, and consumption of our products and services, we treat people of different gender identities as fully equal.

In communicating with your stakeholders, it might be important to give thought to **different literacy levels**, as well as to **cultural barriers** for women in accessing information or speaking out. Together with local organisations, women's groups, and gender experts, search for alternative ways of communication to raise awareness, and stimulate change (such as cartoons, plays, pictures, infographics, etc.). For example, when creating communication materials for audiences with low-literacy levels, such as factory workers or farm hands, it helps to include simple, and easy to understand messages. Minimise the amount of text used, and instead repackage the key messages into audio visual formats, such as infographics, video messages, and cartoons.

There is one final issue regarding the tone and content of your communication. It is wise to **resist the urge to "spin" your messages** to focus only on positive outcomes. Being open and honest about your efforts to deal with real-life risks, and their adverse impacts and which of your mitigating measures actually work, can be a powerful tool in engaging with others to jointly address entrenched, or systemic challenges to gender equality. To serve this purpose, your communication should clearly describe the challenges faced, and provide accurate and timely information about how you plan to remedy the wrongs done. Even during the implementation phase, it is essential to maintain a flow of information on the status of your corrective steps, and how you are dealing with ongoing impacts.

In addition to the corporate company's story itself, authentic stories of the actors in the value chain are of value. Let the small farmers in Ethiopia, the young women in the sweatshops in Bangladesh, the factory owner in China, the cashier in Germany, and the warehouse workers in The Netherlands tell real time about the changes they may or may not be experiencing in the way they operate, their working conditions, their lives or in their community: stories about the true impact achieved. Ultimately, no Key Performance Indicator can beat such stories!

### 5.5.3 COMMUNICATION CHANNELS



Most companies will probably have a communications plan in place already that includes many different channels. The aforementioned goals can be achieved and the types of messages and 'tone of voice' can be shared through these channels without the need to create additional channels.

One channel that we want to highlight in this regard is **sustainability reporting** that includes a gender component, such as GRI's Sustainability Reporting Standards, or the UNGP [Reporting Framework](#). Both, as explained in the boxes below, can help organisations make information about their commitment to gender equality, actions and impacts broadly available, and hence enhance transparency. Sustainability reports can specifically highlight a company's commitment to gender equality, and identify areas where making progress could help attract talent and improve their business.

#### GLOBAL REPORTING INITIATIVE (GRI)

There are several ways in which the GRI Standards encourage looking into gender measurements.

[GRI 401: Employment](#), for example, provides guidance on hiring, recruitment, retention, and working conditions (such as parental leave policies), both within the company and throughout the supply chain.

Another GRI Standard that supports companies' GR-HRDD processes is [GRI 405: Diversity and Equal Opportunity at work](#). This disclosure encourages the reporting organisation to describe the broader legal and socio-economic environment that provides opportunities for, and barriers to, gender equity. The disclosure also focuses on age, and can include minority or vulnerable groups. This requirement can help generate additional quantitative data that organisations can use to make decisions to promote diversity, eliminate gender bias, and support equal opportunity. These measures can further contribute to retaining qualified employees.

Additional disclosures that relate to this topic can also be found in:

[GRI 404: Training and Education](#)

[GRI 406: Non-discrimination](#)

#### THE UNGP REPORTING FRAMEWORK

The UN Guiding Principles on Business and Human Rights (UNGPs) state that business enterprises whose operations or operating contexts pose risks of severe human rights impacts should report formally on how they address them. Moreover, such information should be provided in such a way, whether through formal reporting or otherwise, that enables stakeholders to properly evaluate a company's efforts to prevent, and address human rights abuses. The UNGPs emphasise broader opportunities to convey relevant information to stakeholders, and how adapt your communication forms and channels to different types of stakeholders.

Launched in 2015 by Shift and Mazars, the UNGP [Reporting Framework](#) is organised around eight questions that help companies comply with the expectations of the UNGPs by reporting on their human rights performance. The framework includes a useful bibliography, where you can find [cross-references](#) to related reporting initiatives. With the above suggestions, the framework is more gender responsive.

## PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN PRACTICE, SEE THE REPORT, PART 2.





## STEP 6: PROVIDE FOR, OR COOPERATE IN REMEDIATION WHEN APPROPRIATE



Despite making substantial efforts to mitigate human rights risks, a company may still encounter violations of its gender equality policy. This can happen within the company or may be reported amongst its suppliers and sub-contractors, with a broad range of likely impacts. These may include a gender bias during staff promotions, unethical recruitment practices, workplace discrimination, concerns about wages, a lack of female-friendly sanitary facilities, and sexual harassment and other cases of severe abuse. The UN Guiding Principles and the OECD Guidelines prescribe that States and companies take appropriate actions to ensure those harmed by corporate actions or omissions, have access to effective remedy. The extent to which companies need to take action to address identified negative impacts, depends on the degree of their involvement. Companies that actually caused or contributed to adverse impacts must provide remediation to the victims.

It is for this reason that providing a structured mechanism through which workers and other rights holders can report **grievances** (or sometimes called a 'formal complaint'), and which are subsequently dealt with through clearly defined management procedures, is an essential element in GR-HRDD. A good grievance procedure, and effective dispute management, can have a positive impact on labour-management relations, staff turn-over rates, and production efficiency.

Once reported, the company must also address (and be seen to address) the complaints received by designing and applying a **remediation** mechanism. The goal of remediation is to restore individuals or groups that have been harmed by a business activities to the situation they would have been in had the impact not occurred. Where this is not possible, it can involve compensation, other forms of remedy that try to make amends for the harm caused, and addressing the (persistent) root causes of the problem within the company or its supply chain. It goes without saying that the company must also deal firmly with the perpetrator, in a manner that fits the seriousness of the abuse committed.

Once the (immediate) rights violation has been addressed, it is crucial that you update your policies, management systems, and risk mitigation procedures, and take any further actions required to root out the underlying causes of the problem.



In carrying out your due diligence, it is also important to underscore that activating the company's grievance mechanisms will not preclude a complainant's pursuit of external remediation. Those affected should always be able to resort to state-instituted judicial mechanisms (e.g. courts, labour arbitration tribunals, or those mechanisms established by national human rights bodies or) and non-judicial means (e.g. National Contact Point, national human rights institutions, Ombudsman) that contribute to the resolution of conflicts arising from the conduct of companies. In the next paragraphs we provide you with guidance to make your grievance and remediation mechanisms suitable to address human rights violations. Since this tool is about putting a gender lens on your HRDD, we refer to gender-related risks in particular.



### 5.6.1 UPDATE AND APPLY YOUR GRIEVANCE MECHANISMS

Grievance mechanisms are designed to support people to report on any violation of your company's policies that do harm. Within the context of GR-HRDD, grievance mechanisms are particularly useful channels for rights holders, other actors within the broader supply chain, witnesses of violations (such as travellers, community members), and others, to report on abuses. Operationalising such mechanisms helps alert your company to any deviations from relevant human rights standards (think of the labour rights principles as discussed in previous sections) and ensure that risks are identified and acted upon in a timely manner.

To update and apply grievance mechanisms in the context of GR-HRDD, the following design principles<sup>1</sup> are particularly useful:

#### What is the purpose of the grievance mechanisms?

Grievance mechanisms can play a critical role in meeting your responsibility to respect human rights immediately as well as in the long term. Therefore, take into account the following:

- Use your grievance mechanisms to appropriately and seriously **deal with (gender-specific) human rights violations that have actually caused harm** to your rights holders. The purpose is to fully understand the impact of such abuses, determine (beyond doubt) the root causes, remedy the wrongs done, and compensate those who have been harmed.
- Use your grievance mechanisms to **address problems before they escalate** and actually do harm.
- Also, seek to identify any risk patterns that can feed directly into **broader and long-term GR-HRDD improvements** to cease or prevent activities that cause negative impacts, or to further limit the likelihood and/or impact of gender-specific human rights violations.

#### For whom and for what issues are the grievance mechanisms intended?

In the context of GR-HRDD, four grievance mechanisms should be considered.<sup>2</sup>

First, an **internal grievance mechanism** enables a company's own staff (or their representatives or witnesses) to report grievances occurring within the boundaries of the company. In this sense the company can be a global brand or a supplier. The Fair Labour Association (FLA), Ethical Trading Initiative (ETI), Workplace Relations Commission (WRC), and Social Accountability International (SAI) encourage such local solutions to complaints and disputes. These internal grievance mechanisms should be used as a first resort to settle complaints. The main responsibility for dealing with grievances of supply chain workers lies with the direct employer. It follows that local or workplace-level grievance channels will be the most effective and accessible way for workers to seek redress.

However, access to remedy through such routes is often limited in practice, while, at the same time, (female) workers at suppliers are among the rights holder groups most vulnerable to human rights violations. This can lead to a significant gap with regard to the provision of remedy for such impacts. There are a number of ways in which buying companies (such as global brands and retailers) can help bridge this gap and improve access to remedy in global supply chains. This includes the provision of formal and overarching **external grievance mechanisms** that enable external complainants (e.g. workers of a supplier) to file formal complaints with the buying company. The global company can then follow up the grievance with its supplier and push for remediation, since it may constitute a violation of the Supplier Codes of Conduct, and related procurement contracts.

A third category is **the grievance mechanisms of multi-stakeholder or sector initiatives (MSIs)** in which companies participate, such as the third-party complaints mechanisms of the Fair Labour Association, Fair Wear Foundation, and the Roundtable on Sustainable Palm Oil. In these

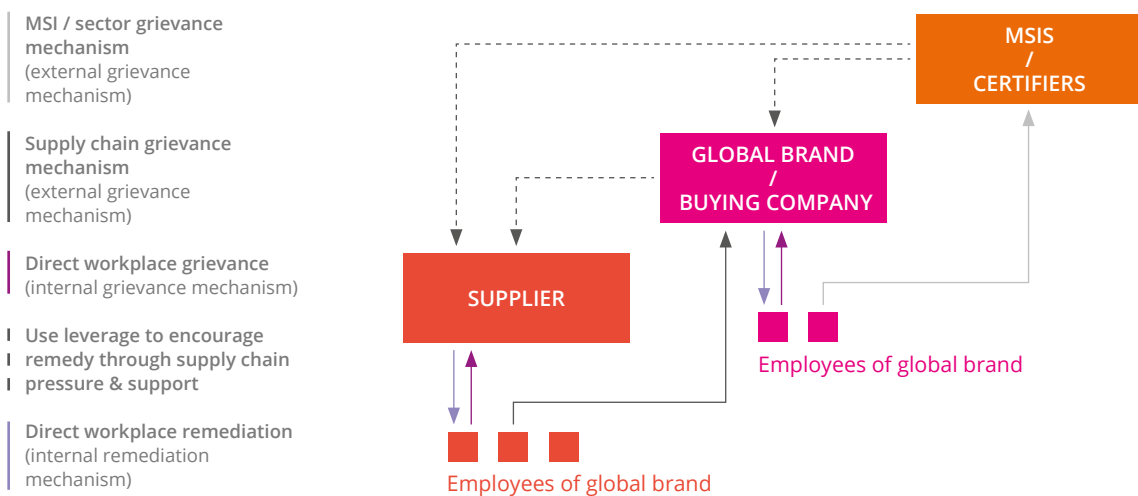
<sup>1</sup> [Compliance Advisor Ombudsman: Grievance mechanism toolkit](#).

<sup>2</sup> There is a fifth category, namely state-based grievance mechanisms. A company should inform its stakeholders about the existence of these mechanisms, but since a company cannot directly influence the set-up and workings of a state-based grievance mechanism, we do not discuss this any further in this GR-HRDD Tool.

MSIs companies can work together on a sector-based grievance mechanism, development and execution of sector-tailored training on RBC and (GR-) HRDD, in-depth analyses of gender-specific human rights risks, a sector-based database on these risks, development and implementation of risk mitigating plans (including tracking of effectiveness thereof), and sector-based communication.

A final category relates to specific **grievance mechanisms developed for community complaints** related to a high-impact project that can have potentially significant consequences for local communities (e.g. developing a large-scale resort and golf courses, opening up a mine, etc.). The figure below presents an overview of the various grievance mechanisms:

### Typology of different approaches to grievance mechanisms and access to remedy in a supply chain setting



With this in mind, the following guidance should be considered:

1. To enhance its effectiveness, always design the grievance mechanism with a **focus on potential users**. In other words, do not create a mechanism solely from the company's perspective, with the main objective being to protect your business interests.
2. Take into account the **common lack of personal experience, cultural support and/or union representation** for blowing the whistle, filing complaints, and seeking remedy.
3. Ensure that grievance mechanisms are **known by, and accessible to** all rights holders for whose use they are intended (also people outside a company). Take into account barriers they are likely to face with respect to language, literacy levels, and access to information and digital technologies (as well as opportunities). Also consider mobility and time limitations due to unpaid care responsibilities, as well as the needs of contract workers (such as migrant women) who face heightened risks. Such groups will likely also have poor access to formal representation, workplace training, and limited or no understanding of workplace policies and procedures. See the Helpful Resources section of the [workbook](#) for information on some digital tools.
4. Explicitly state **what (gender-based) human rights issues can be reported**, and subsequently investigated. This can also help avoid inadmissible complaints.
5. Carefully determine **the level(s) at which a grievance mechanism** is needed: a project, business unit, an entire enterprise, first-tier suppliers, local communities, consumers, or even an entire industry.
6. Provide your rights holders with information about relevant grievance mechanisms outside the company, including at regional and international levels. An extensive list can be found at the [SOMO](#) website.



### How do you ensure trust in the grievance mechanisms?

Barriers to access to grievance mechanisms may relate to trust and confidence. For example, complainants may be afraid or uncertain about remote or complicated mechanisms, distrust the institutions where they're located, and/or fear retaliation. Confidence is one of the hardest factors to instill and to measure, but not impossible if you apply the following advice:

1. **Consult, and collaborate with relevant stakeholders**, including your female workers, workers' representatives, trade unions, gender experts, government agencies, and NGOs. This will help **increase the level of trust that potential users have** in the mechanism. In fact, worker-driven standards and feedback loops can capture risks and impacts in a way that traditional social policies and audit systems might not.
2. Trust is also built through **in-person awareness raising**. Evidence from the Fair Wear Foundation shows a significant increase in complaints received after they have done audits or trainings in a company.
3. Retaliation against complainants is a serious problem. Violence against whistle-blowers, human rights defenders, and victims who formally complain is a common problem in many countries. Therefore, do your utmost to instil confidence among complainants that **reporting human rights abuses will, in and of itself, not lead to sanctions and/or violence against them personally**. Such assurances can be reinforced by safeguarding the anonymity of complainants and implementing a zero-tolerance policy for any retaliation against complainants.
4. For each individual grievance, make it formally known (after appropriate investigations) **whether the complaint has been substantiated**.
5. Always **safeguard the privacy and anonymity** of the complainant (from, amongst others, factory management) while simultaneously **recording all relevant data** to support the allegations in writing. Bear in mind the principle that one is innocent until proven guilty, and hence also protect the privacy of (alleged) wrongdoers when investigating complaints.
6. Guarantee **transparency** by keeping all parties to a grievance informed about the progress of the grievance handling and providing sufficient information about the mechanism's performance to ensure confidence in its effectiveness and fairness.
7. Provide for **provisions for accusers** throughout the grievance process, such as provisions for medical and psychological care, legal support, and access to social services such as shelter and counselling, or assistance for the victim's voluntary return and reintegration into his/her community of origin. It is likely that many accusers will require some form of support from the moment they lodge a complaint.

### How does the grievance mechanism work?

To ensure that (in)formal complaints and grievances are handled effectively and efficiently, the next guidance points are worth considering:

1. If possible, do not start from scratch but rather build on the array of formal, as well as informal grievance mechanisms that are already in place. These could include procedures embedded within the constitutions of workers' councils or trade unions. Other precedents may be contained in your whistle-blower policies, reporting mechanisms for sexual harassment, health and safety incident-reporting systems, employee conflict management programmes, and so on. Identify the **"white spots" in existing grievance mechanisms that may require additional strengthening in order** to deal with gender-specific human rights violations. For example, you should consider whether all the main stakeholder groups that could potentially be impacted by the company have access to a grievance mechanism (such as those organised by the state, global brand or supplier). Also consider support for groups that may fall between existing mechanisms, such as contract workers on company premises who can access the company's mechanism but lack representation by a trade union.
2. Apply a range of **grievance instruments** such as: multilingual speak-up lines (accessible by telephone, email, intranet, social media, etc.), whistle-blower procedures, counsellors, or confidential meetings with complainants.
3. Establish **clear and predictable** grievance and remediation processes with set timelines, as well as expected inputs, outputs and outcomes for each step of the due diligence process. It should be clear that complaints will be investigated within the agreed timeframe, and that all parties will be kept informed about progress. An example of such a systematic

- process could be: (1) input for a formal complaint is a written document; (2) a receipt confirmation will be sent as formal output to the complainant within 1 working day after receipt; (3) the complaint will be assessed within 10 working days after receipt; (4) the findings will be reported in a formal report as an output; and (5) a possible outcome could be that the complaint is deemed valid and a remedy procedure initiated.
4. Put in place equitable procedures to **conduct unbiased and independent investigations** to find out both what happened, who is involved, who is accountable, and what the underlying root causes are of the violation. The investigation can also find evidence to disprove a complaint. It should be noted that in many cases of gender-related complaints, failing to uncover and address the root causes will make more difficult to achieve long-term remediation and prevent similar issues from occurring in the future. Remember that it is very difficult to act on the basis of “word against word” accusations. Investigations that lead to clear evidence supporting the claim of the complainant also place you in a stronger position vis a vis management of the company in which the violation occurred.
  5. Provide for **mediation** (where applicable or desirable to the parties involved) to facilitate discussion between the accuser and alleged wrongdoer. Such provisions should allow for equitable access information, advice, and expertise for all parties.

#### Who is involved in the grievance mechanism?

To ensure adequate functioning of the grievance mechanisms, it is important to staff them with the right people, and to take full accountability as a company for the fair conduct of grievance processes. To do so, you can apply the following guidance points:

1. Select and train staff that will be responsible for the daily operations of the grievance mechanism and ensure they have the relevant **competencies** to deal with gender-specific human rights grievances. Make sure a gender-balanced structure is in place.
2. In cases of anonymous complaints, provide for the role of a **trusted third party** who can ensure confidentiality, and facilitate communication with the complainant.
3. Make the grievance mechanism fully transparent, and let all parties know who is ultimately **accountable** for the fair workings of the mechanism. In this regard, it is highly preferred to place this responsibility with a high-level company representative, such as a member of the Executive Committee.

#### What can a sourcing company do to strengthen grievance mechanisms at its suppliers?

As a sourcing company, for example a global brand, you can provide access to an external grievance mechanism for workers of your suppliers. But you can also encourage your suppliers to put in place internal grievance mechanisms to help explore local solutions to complaints and disputes. To do so, you should bear in mind the following:

1. You can **require suppliers to put in place grievance procedures** that are accessible for workers and report to you on the number and subject of grievances they receive from their workers.
2. **Work with suppliers to build management capacity** for the effective handling of worker complaints, as well as to enhance workers’ knowledge of their rights in relation to the available grievance channels. You can provide training to supplying companies to build their capacity for code compliance, including in areas that support grievance mechanisms, such as worker-management relations. For this you can cooperate with the relevant industry organisations such as SAI, ETI, the FLA and Fair Wear, who have such trainings readily available.
3. Since training programmes also face limitations of scale and resources, you may also want to consider **using web-based assessment and training tools** designed to simultaneously tackle the challenge of reaching thousands of suppliers, and the need to improve the quality of their grievance mechanisms.





### 5.6.2 UPDATE AND APPLY YOUR REMEDIATION MECHANISMS

To deal with gender-based human rights violations, and any resulting grievances, remediation should always be two-sided:

- provide safe and confidential treatment, services, redress, compensation, and justice to victims
- appropriately deal with the (alleged) wrongdoers

#### **Provide safe & confidential treatment, services, redress, compensation, & justice to victims**

To provide remediation for the victim(s), the type of remedy or combination of remedies that is appropriate will depend on the nature and extent of the adverse impact. Any gender-based barriers should be removed from any compensation scheme. The following remediation instruments are worth considering:

1. Restore the affected individuals and/or communities that have been harmed by a personal action of a colleague or a business activity to the situation they would have been in had the negative impact not occurred. Do note that this might be difficult to achieve in some cases, such as with gender-based violence, due to the psychological harm done.
2. Proactively provide information concerning available judicial, and other remedies, and ensure that all right holders may freely access these. In most cases, trying to resolve issues where they arise – that is, in the employment relationship between the worker and the company she is working for – will be the most appropriate and effective way to facilitate access to remedy. However, if a grievance is filed at the external grievance mechanism of the buying company, the company should facilitate the process, or even demand remedy by the supplier.
3. Provide fair financial compensation or restitution from the employer to victims, their families or dependants for the harm and loss suffered (e.g. establishing compensation funds for victims, compensating for lost wages related to overtime work, restitution of properties, retroactively reimbursing pay rises, etc.)
4. Provide financial compensation from the offender to the victim.
5. Provide for [rehabilitation and recovery](#), which can include medical and psychological care, legal and social services, such as shelter and counselling, as well as assistance for the victim's voluntary return and reintegration into his/her community of origin.
6. Reinstate female workers who have been dismissed due to pregnancy or sick leave.
7. Offer rehabilitation in the form of providing guidance and support to a harmed worker to enable safe and timely return to work after an injury, harassment or abuse. For this, you can work together with local experts, NGOs or trade unions.
8. Compensation arrangements can include non-financial measures such as: verifying and acknowledging the violation of the victim's rights; taking steps to ensure the violation stops; and providing future empowerment programmes and/or educational programmes for women to improve their career prospects, wage levels, productivity, efficiency, and quality of work. It is wise to look for local partners who are able to help support you in implementing such programmes.
9. Ensure that provisions on gender-based violence are embedded into collective bargaining agreements.
10. Pay financial penalties instituted by governments for violating regulations pertaining to women's human rights, which can also intersect with aspects such as damage to the environment and corruption.
11. Ensure that the remedies proposed are in accord with internationally-recognised human rights principles.
12. Recognise that gender-based violence and harassment is a product of the culture, including workplace culture. Facilitate workplace trainings on topics such as gender-based violence and harassment, grievance mechanisms, social dialogue, and unionisation.

### Appropriately deal with the (alleged) wrongdoers

To appropriately deal with (alleged) wrongdoers of the gender-based violations, a range of deterrent, punitive and corrective remedies can be applied:

- Engage the relevant workers' union (including its female members), as well as women's organisations and gender experts, to develop victim-centred approaches that are contextually relevant, and to identify appropriate deterrents, punishments, and corrective remedies.
- Impose punitive sanctions (e.g. fines, demotion, or outright dismissal) to match the scale of the human rights infringement.
- Bring perpetrators and evidence of their wrongdoing, to the attention of authorities to initiate, and facilitate criminal prosecution.
- Propose remedies that can target discriminatory norms, beliefs, and power structures that foster gender-specific human rights violations.
- Temporarily suspend a relationship with a supplier who is underperforming in terms of gender-specific human rights, while pursuing ongoing risk mitigation. This should only be used as a last resort, once you have explored dialogue with the supplier to establish a way forward, but without success. Consider restarting the relationship once all agreed upon measures are taken, or terminating the relationship if the supplier fails to take appropriate and/or sufficient measures.

### 5.6.3 UPDATE YOUR GR-HRDD POLICIES AND APPROACHES



Based on insights from frequently occurring grievances you should revisit and improve your policies, your day-to-day operations, supplier codes of conduct, and sourcing practices. The aim should be to fully root out situations that will put at risk women, and other groups made vulnerable due to their gender or perceived gender, and thus prevent future adverse impacts.

Secondly, you can revisit and improve your supplier codes of conduct, and related sourcing practices to identify any unresolved gender-related human rights risks.

Third, you need to evaluate the effectiveness of your grievance and remediation mechanisms to identify possible points of improvement. While internal review mechanisms can provide valuable information, it is important to facilitate regular monitoring and evaluation by independent third parties to enhance the integrity and legitimacy of these processes. In this context, publishing data concerning the operation, outcomes, and performance of the organisation's grievance mechanism is also critical to encourage participation by stakeholders and improve your internal practices. See [workbook](#) for Key Performance Indicators on grievance and remediation mechanisms.



Next, you can use the insights gathered to openly challenge gender biases, and related human rights infringements, across the entire company, from the shop floor to the boardroom. And finally, you should communicate the updated policies, operational guidance, supplier codes of conduct, and sourcing practices with all staff (top management, middle management and workers) and suppliers.

## PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN PRACTICE, SEE THE REPORT, PART 2.



## 6: CALL TO ACTION

### 6.1 MOVE AHEAD TO ACHIEVE GENDER EQUALITY AND REAP THE BENEFITS

The preceding chapters have explored various dimensions of the business case for pursuing gender-responsive human rights due diligence, and especially its positive effect on women's empowerment.

We recognise that while there are some low hanging fruits in addressing gender issues, tackling some of the more entrenched and systemic barriers to women's advancement can be quite overwhelming. Nevertheless, we hope that we have provided sufficient evidence that it is doable, as well as some helpful guidance on where to get started on your own GR-HRDD journey.

Among some tools that we have explored is the GR-HRDD Maturity Assessment. It helps you to quickly identify where your company stands with respect to gender equality, as well as any other human rights risks that may be found in your supply chain. We provide numerous insights on the business case for focusing on gender, explain how to link to risks you encounter and to your efforts to contribute to the SDGs, and take you through many practical checklists and templates for conducting your GR-HRDD process. To help you break the ice with colleagues and business associates, we have also thrown in a fun quiz to increase awareness on why investing in gender equality makes sense.

We applaud you for embarking on, or continuing your journey towards GR-HRDD compliance. You are part of a growing community of companies, trade unions, women's organisations, human rights-focused NGOs, and governments that are exploring how to join forces to achieve gender transformation in businesses and their supply chains.

Most importantly, we urge and encourage all companies to do their utmost to achieve gender equality! This is of value, not only for your own bottom line, but also for female rights holders, and other marginalised groups.

### 6.2 CONTRIBUTE TO THIS GR-HRDD TOOL TO IMPROVE IT

We consider this document to be a "living tool." The concept of GR-HRDD is still in its infancy, which means there is still a lot to learn, not only by companies, but also other relevant stakeholders (women's organisations, human rights focused NGOs unions, governments). By gathering and sharing new in-depth understandings, as well as practical examples from diverse supply chains, we can further strengthen future GR-HRDD approaches.

We encourage companies to start to use this tool, and to explore its functionality in all its dimensions. As they do so, we hope that also your company will share your own business cases, insights gained on the relevance and usability of the instruments, and your learnings from practice. This information will be invaluable in continuously updating, and improving the tool. [Plan International Netherlands](#) has aligned efforts with Women Win, who are developing an online GR-HRDD platform, where more information can be found on due diligence.

In particular it will be highly interesting and useful for your peers and other stakeholders to share:

- Insights gathered from GR-HRDD Maturity Assessments.
- Lessons learnt from working with your suppliers in your GR-HRDD efforts.
- Your own business case (both qualitative and financial) for achieving gender equality.
- Examples of the positive effects your GR-HRDD efforts have had on female rights holders.
- Your gender equality policy, including policy statements for each of the nine human rights principles.
- Examples of internal and external risks encountered that have a profound impact on women.

- Proven mitigating measures and their effects on reducing the likelihood of occurrence of risks and/or the negative impact of risks on women.
- Examples of the (Key) Performance Indicators and monitoring instruments you have successfully applied to track your implementation and results (with particular attention to how to move beyond financial audits).
- Examples of communication with your stakeholders about your progress on gender equality and how this affected their behaviour towards gender equality in general, and towards your company's efforts in particular.
- Proven grievance and remediation mechanisms.

We invite as many companies as possible to join our journey towards making human rights due diligence processes gender proof, and as effective and efficient as possible for all current and future users!





## HELPFUL RESOURCES

This Gender-responsive Human Rights Due Diligence (GR-HRDD) guidance includes many references to interesting sources, such as research publications, company reports, on-line articles, etc. This appendix presents additional resources to help you implement your due diligence processes. The resources are clustered according to the main chapters of the toolkit.

### CHAPTER 2. MAKING BUSINESS SENSE OF GENDER EQUALITY

Castan Centre for Human Rights Law, International Business Leaders Forum, and Office of the United Nations High Commissioner for Human Rights, 2008. [Human Rights Translated. A Business Reference Guide](#). This report explains human rights in a way that makes sense to business, using case studies to illustrate why human rights are relevant for your business, and how to manage them in a corporate context.

Plan International and Girls Advocacy Alliance, 2019. [Cashing In: The Business Case for Women's Empowerment in the Garment Industry](#). The following [video](#) highlights a positive business case for respecting gender-specific human rights in Bangladesh.



Plan International and Girls Advocacy Alliance, 2020. [Female & Thriving: The Business Case for Women's Empowerment and Retention in the Hospitality and Tourism Sector in Nepal](#).

UNDP and UN Women, 2018. [Gender Equality as an Accelerator for Achieving the Sustainable Development Goals](#). This paper explains why action is needed to accelerate progress on: (i) ensuring equal rights, opportunities and outcomes for both women and men; (ii) enhancing women's agency, capabilities and participation in decision-making processes; (iii) eliminating gender-based violence and discrimination; and (iv) transforming power relations at all levels of society.

### CHAPTER 3. GENDER-RESPONSIVE HUMAN RIGHTS DUE DILIGENCE

The [Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework](#) (UNGPs in short) were developed by the UN Secretary-General's Special Representative on Human Rights and Transnational Corporations and other business enterprises. The UN Human Rights Council endorsed the Guiding Principles in its resolution 17/4 of 16 June 2011.

The [OECD Guidelines for Multinational Enterprises](#) (2018) are recommendations to multinational enterprises operating in, or from adhering countries that provide non-binding principles and standards for responsible business conduct in consistent with applicable laws and internationally-recognised standards. The Guidelines are the only multilaterally agreed and comprehensive code for responsible business conduct that governments have committed to promoting. For several sectors (minerals, extractives, garment and footwear, agriculture, institutional investors, child labour) specific guidelines have been developed. The Guidelines contain a reference to gender-related human rights (pages 41 – 42).

The [UN Global Compact](#) is an initiative launched under the auspices of the UN in the field of corporate social responsibility. For more information on the relationship between the UNGPs on Business and Human Rights and UN Global Compact, see [here](#).

[Doing business with respect for human rights. A guidance tool for companies](#) is a toolkit developed by Shift, Global Compact Network Netherlands, and Oxfam (2016). This tool contains practical experiences, insights, and advice to help companies respect human rights.

ICCO, 2017. [Doing Responsible Business. A Roadmap for SMEs in the fruit and vegetable sector](#). Action Aid, 2020. [We Mean Business: Protecting women's rights in global supply chains](#).

IEH, ETI, DIEH, 2017. [Guide to Buying Responsibly](#). This reference guide is for senior managers responsible for purchasing, individual buyers and their teams and all teams with a connection to procurement. It is intended as a toolkit of practical ideas and step-by-step actions for achieving best practice, supported by the survey findings, expert insights and case studies.

ETI, 2018. [Base Code Guidance](#). This publication is designed to help businesses understand the likely gender issues in their supply chains, and how to respond to them.

OECD, 2018. [OECD Toolkit for Mainstreaming and Implementing Gender Equality](#). This toolkit is designed to support policy makers in implementing the OECD's Recommendation on Gender Equality in Public Life, by helping them design gender-sensitive public policies and services and enable women's equal access to public decision making.

[PIANOo](#) is the Procurement Expertise Centre of the Dutch Ministry of Economic Affairs and Climate. It offers information, advice, instruments and practical tips to anyone involved in the public sector purchasing and tendering works, supplies and services, based on Dutch public procurement law.

United Nations Development Programme (UNDP) and the United Nations Working Group on Business and Human Rights, 2019. [Gender guidance for the Guiding Principles on Business and Human Rights](#),

WomenWin, 2020. [Gender responsive Procurement playbook](#).

### Applying the labour rights principles

Throughout this GR-HRDD tool, reference has been made to nine principles. In the following overview, we highlight how a number of organisations apply a number of these principles in their human rights due diligence processes. This can provide some inspiration on some entry points for linking these principles to your own due diligence processes.

### Dutch NGOs with expertise in labour law, and general human rights principles, that can support your GR-HRDD process

Disclaimer: The table below is not exhaustive. Some NGOs work (on a project basis) in sectors that are not ticked below. The table highlights sectors for which these NGOs are best known (although UNICEF is a UN body, it is categorised as a civil society sector organisation for the purposes of this review since it is often referred to as such within the Netherlands).

DUTCH NGOS, UNIONS AND GOVERNMENTAL AGENCIES WITH SECTOR-SPECIFIC EXPERTISE			
GARMENT SECTOR	AGRICULTURE/ FOOD	TOURISM	FLORICULTURE
<ul style="list-style-type: none"> <li>• <a href="#">Arisa</a></li> <li>• <a href="#">FLA</a></li> <li>• Global March Against CL</li> <li>• <a href="#">FWF</a></li> <li>• <a href="#">Plan International NL</a></li> <li>• SCC</li> <li>• <a href="#">Solidaridad</a></li> <li>• <a href="#">Unicef</a></li> <li>• <a href="#">WomenWin</a></li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Agriprofocus</a></li> <li>• Arisa (seeds)</li> <li>• <a href="#">Care</a></li> <li>• <a href="#">CNV</a></li> <li>• <a href="#">FNV</a></li> <li>• Global March Against CL</li> <li>• <a href="#">ICCO Cooperation</a></li> <li>• FLA</li> <li>• <a href="#">Rainforest Alliance</a></li> <li>• Solidaridad</li> <li>• WomenWin</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">ECPAT</a></li> <li>• Plan International NL</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">HIVOS</a></li> <li>• WomenWin</li> </ul>
BANKING	MINING	METALLURGIC (MICA)/ GOLD	
<ul style="list-style-type: none"> <li>• <a href="#">Oxfam</a></li> <li>• CNV</li> <li>• FNV</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Action Aid</a></li> <li>• <a href="#">Terre des Hommes</a></li> <li>• Global March Against CL (via BBA)</li> </ul>	<ul style="list-style-type: none"> <li>• Terre des Hommes</li> <li>• Global March Against CL</li> <li>• Solidaridad</li> </ul>	



### More about the Dutch International Responsible Business Agreements

A risk analysis of internationally operating Dutch companies conducted by KPMG in 2014 highlighted human rights abuses in 13 different business sectors. The KPMG study found that violations of women's rights occur within the supply chains of most important Dutch economic sectors and identified some of these as violence, unsafe and unhealthy working conditions, and little or no right to representation in a trade union.

Building on this KPMG study, a broad-based initiative brought together the Dutch Government, employers, NGOs and labour organisations, under the facilitation of the Social and Economic Council of the Netherlands (SER), to negotiate sector wide agreements on international responsible business conduct (known as the IRBC Agreements). The first IRBC Agreement covered the garment and textiles industry.

The IRBC Agreements are broad-based business covenants that build on international guidelines and commitments. Their aim is to create a level playing field by ensuring that all companies in the sector abide by the same rules of the game. The process of negotiating such an agreement provides businesses with an opportunity to extend their influence by engaging in a structured way with government, trade unions and NGOs to solve complex issues. Sector Agreements have two main goals: to improve circumstances for groups affected by specific risks within a period of three to five years after an agreement has been concluded; and to offer a collective solution to problems that businesses are unable to solve, or solve entirely, on their own. SER assumes responsibility for implementation at parties' request. To support the associated companies, SER facilitates the partners of the covenants in various ways. The SER assesses and discusses the action plans prepared by the companies. Furthermore, it develops and plans a number of trainings to address and highlight specific issues.

Signatories of the (by now) 11 agreements are companies, government, trade unions (FNV and CNV) and Dutch-based international NGOs such as, Arisa, Solidaridad, Global March against child labour, ICCO, HIVOS and UNICEF, as well as their own international partners and local networks. Parties contribute to the relevant SER working groups. The covenants also have a "circle of supporters" who are not direct parties, but can contribute to joint projects and provide knowledge and tools, for example on the locally existing social and gender norms. Such supporters include Fair Wear, Plan International Netherlands (textile agreement) and Terre des Hommes (metallurgic agreement).

Dutch companies that have signed an IRBC Agreement commit to conduct due diligence on their operations and supply chains. Until now, these commitments have been voluntary. Current discussions at the European level signal that regulation may follow. While gender equality is explicitly mentioned in some IRBC Agreements, issues of gender and discrimination are usually not prioritised by Parties.

MAIN PRINCIPLES PURSUED						
THE NINE LABOUR RIGHTS PRINCIPLES	ILO: CORE LABOUR STANDARDS	AMFORI: BUSINESS SOCIAL COMPLIANCE INITIATIVE (BSCI) CODE OF CONDUCT	ETI BASE CODE	FAIR WEAR: CODE OF LABOUR PRACTICES	FAIRTRADECERTIFIED. ORG COMPLIANCE CRITERIA	BSR: GENDER EQUALITY IN CODES OF CONDUCT
<b>A</b> Workers face no discrimination in recruitment, employment and training	Elimination of discrimination in respect of employment and occupation	No discrimination Ethical business behaviour	No discrimination	There is no discrimination in employment	There is no discrimination or abuse	Discrimination
<b>B</b> Workers receive fair wages and benefits at a living wage level		Fair remuneration	Living wages are paid	Payment of living wage	Workers receive fair wages and benefits	Wages and benefits
<b>C</b> Workers work reasonable hours at decent conditions		Decent working hours	Working hours are not excessive	Reasonable hours of work	Individuals work reasonable hours	Working hours
<b>D</b> Workers freely choose their work, and are not forced, bonded, or obligated to work	Elimination of all forms of forced or compulsory labour Effective abolition of child labour	Special protection for young workers No bonded labour No child labour	Employment is freely chosen Child labour shall not be used	Employment is freely chosen No exploitation of child labour	There is no forced, bonded, or compulsory labour Children and young workers are Protected Migrant workers are ethically recruited	Forced labour
<b>E</b> Workers are not harassed or abused			No harsh or inhumane treatment is allowed		There is no discrimination or abuse	Harassment and abuse
<b>F</b> The work environment is safe and healthy, and workers have access to basic needs and services		No precarious employment Occupational Health and Safety	Working conditions are safe and hygienic	Safe and healthy working conditions	The work environment is safe Workers have access to basic needs and services	Health and safety
<b>G</b> Freedom of Association and the Right to Collective Bargaining are respected	Freedom of association and the effective recognition of the right to collective bargaining	Respect for freedom of association and the right to collective bargaining	Respect for freedom of association and the right to collective bargaining	Freedom of association and the right to collective bargaining	Freedom of association and the right to collective bargaining are respected	Freedom of association and collective bargaining
<b>H</b> Workers have a legally binding employment relationship with clear contracts and conditions			Regular employment is provided	Legally binding employment relationship	Employment contracts and Conditions Are Clear Workers Understand Their Rights and Are Able to Air Grievances and Communicate Concerns	Employment relationships
<b>I</b> Workers can own land and have access to safe natural resources		Protection of the environment			Water is used efficiently Production methods protect waterways and ecosystems Pesticides and other chemicals are used safely Waste disposal does not threaten human health or the environment	

## CHAPTER 4. MATURITY ASSESSMENT: EXAMPLES OF BUSINESS RANKING INITIATIVES FOCUSING ON GENDER PERFORMANCE

To further assess and communicate how your company ranks on gender performance, as well as its compliance with diverse gender-specific human rights guidelines and maturity models, it is useful to look at some gender performance ranking initiatives.

### **Bloomberg Gender Equality Index (GEI)**

The GEI tracks the financial performance of public companies committed to disclosing their efforts to support gender equality through policy development, representation and transparency. The index comprises companies committed to transparency in gender reporting and advancing women's equality in the workplace. The index includes 230 companies from 10 sectors headquartered across 36 countries. It measures performance in: female leadership and talent pipeline; sexual harassment policies; inclusive culture; pro-women brands; and equal pay and gender parity pay. The data fact sheet 2020 can be found [here](#).

### **Equileap**

[Equileap's Gender Equality Scorecard™](#) is a methodology used to holistically assess a company's gender equality performance, from the board to the supply chain. It is based on various metrics including gender balance across the workforce, the gender pay gap, paid parental leave and anti-sexual harassment policies.

### **Global Gender Gap Report 2020**

Since 2006, the World Economic Forum coordinates the [Global Gender Gap Index](#). These annual assessments of gender-based gaps, have a focus on four key dimensions: Economic Participation and Opportunity; Educational Attainment; Health and Survival; and Political Empowerment. It also tracks progress towards closing these gaps over time. The Report's conclusions are based on a methodology integrating the latest statistics from international organisations, as well as a survey of executives. The most recent Global Gender Gap Report reveals that today, women have lower workforce participation than men (55 percent compared to 78 percent), hold limited leadership positions globally (representing 36 percent of senior managers and officials, with even lower representation in higher positions), face persistent gender pay gaps, and continue to be victims of sexual harassment and violence.

### **World Benchmarking Alliance**

The [World Benchmarking Alliance](#) (WBA) aims to measure corporate gender impacts and to accelerate progress towards gender equality and women's empowerment through its Gender Benchmark. This initiative is part of WBA's wider work to measure and rank the world's 2,000 most influential companies on their contributions to achieving the SDGs by 2030. The assessment covers each company's performance on social inclusion, of which gender is a core part. The Gender Benchmark also assesses and compares how companies are driving and promoting gender equality and women's empowerment across their entire value chain.

## CHAPTER 5. HELPING YOU TO IMPLEMENT THE SIX STEPS OF THE GR-HRDD

The following sources provide additional information and guidance for each of the six GR-HRDD steps.



### STEP 1: EMBED GENDER EQUALITY INTO YOUR POLICIES & MANAGEMENT SYSTEMS



#### Gender-sensitive policies

ETI, 2018. [Gender equality as an enabler of workers' rights](#). The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. ETI envisions a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.

BSR, 2017. [Gender Equality in Codes of Conduct Guidance](#). This report provides a framework for companies to integrate gender equality considerations into the standards they use to set supply chain ethical requirements.

ILO, 2020. [Empowering Women at Work – Company Policies and Practices for Gender Equality](#).

South Australian Government, 2017. [Guidelines for gender neutral recruitment](#).

#### Women's empowerment policies

[UN Women's Empowerment Principles](#) (WEP) are a partnership initiative of UN Women and UN Global Compact that provide a set of considerations to help the private sector focus on key elements integral to promoting gender equality.. The WEP Gender Gap Analysis Tool is a business-driven tool designed to help companies from around the world assess gender equality performance across the workplace, marketplace, and community.

### REFERENCES TO INTERNATIONAL GENDER-RELEVANT CONVENTIONS

#### ICECSR and CEDAW

ICECSR and CEDAW explain that women's right to work requires equal opportunities and treatment as well as the elimination of discrimination on the grounds of marriage or maternity. In addition, rights at work include: fair wages and equal remuneration for work of equal value; safe and healthy working conditions; equal opportunities and non-discrimination, including in relation to hiring, promotion and training; rest, leisure and reasonable limitation of working hours and periodic holidays with pay; the right to form and join trade unions; social security, including but not limited to 'special protections' such as paid leave and adequate benefits for women before and after childbirth.

#### ILO fundamental conventions

The ILO Conventions aim to promote decent work: work that is productive and delivers a fair income, security in the workplace and social protection for families, better prospects for personal development and social integration, freedom for people to express their concerns, organise and participate in the decisions that affect their lives and equality of opportunity and treatment for all women and men.

**The ILO fundamental conventions are:**

- Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
- Forced Labour Convention, 1930 (No. 29)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
- Abolition of Forced Labour Convention, 1957 (No. 105)
- Minimum Age Convention, 1973 (No. 138)
- Worst Forms of Child Labour Convention, 1999 (No. 182)
- Equal Remuneration Convention, 1951 (No. 100)
- Right to Organise and Collective Bargaining Convention, 1949 (No. 98)

**Others to note:**

- Maternity Protection Convention, 2000 (No. 183)
- Workers with Family Responsibilities Convention, 1981 (No.156)



## STEP 2: IDENTIFY & ASSESS GENDER RISKS & ADVERSE IMPACTS



### CSR risk information

The [CSR Risk Check tool](#) is aimed at companies that are exporting to, importing from, or have production facilities in foreign countries.

[Modint Due diligence tool for the garment industry](#). Together with parties and supporters of the IRBC Agreement for Sustainable Garments and Textiles, Modint (a Dutch sector organisation) has developed a due diligence tool. It gives an overview of projects and tools that companies can use to get more insights in the risks in their supply chain and to mitigate these risks. The tool contains leading documents, studies, trainings, projects and indexes on social and environmental risks in the garment & textile sector. The tool was developed in collaboration with diverse interested organisations, including Amfori, CNV International, Fair Wear Foundation, FNV, Four Paws, Plan International, Solidaridad, Hivos, LIW, Unicef and WRAP.

[Equal measures 2030. Harnessing the power of data for gender equality](#). The 2019 SDG Gender Index is the most comprehensive tool available for exploring the state of gender equality across 129 countries (covering 95% of the world's girls and women), 14 of the 17 Sustainable Development Goals, and 51 targets linked to issues inherent in the SDGs. The Index finds that, with just 11 years to go until 2030, nearly 40% of the world's girls and women – 1.4 billion – live in countries failing on gender equality.

### Gender fact sheets per country

Fair Wear has developed [gender fact sheets](#) for the following countries: Bangladesh, Bulgaria, China, India, Indonesia, Myanmar, North Macedonia, Romania, Tunisia, Turkey, Vietnam.

### Forced labour

Fair Labour Association. [Addressing risks of forced labour in supply chains](#).

[Due Diligence Toolkit for Responsible Business Conduct](#). This toolkit aims to assist spice companies (producers and traders) in implementing adequate Due Diligence Management for Responsible Business Conduct. Module 1 covers General Due Diligence Management, and Module 2 is a special module devoted to the abolishment of child labour.

Fund against Child Labour, 2020. [Lessons Learned . Practical steps for due diligence and remediation by companies](#). This publication shares examples and showcases successes by companies and their stakeholders in pursuing the elimination of child labour.

### Freedom of association and collective bargaining

Shift and FNV Mondiaal, 2019. [Respecting trade unions rights in global value chains. Practical approaches for Business.](#) This resource seeks to equip companies with practical ideas and tools for taking action, in order to help close the gap between commitment and practice.

[Fair Wear's approach to social dialogue.](#) This policy document explains how the advocacy organisation intends to scale up joint efforts to tackle entrenched legal and practical barriers to achieving fundamental human rights in the workplace and across supply chains through a new approach to social dialogue that also takes gender into consideration. The document explains what Fair Wear is currently doing to: a) foster broader efforts to develop systems for worker organising and negotiation that meet 21st century realities; and b) lay a clear and practical path for member brands and their suppliers – and most importantly the workers who make members' products – to more effectively realise workers' freedom of association and collective bargaining.

### Violence and harassment

Fair Wear Foundation and ITC/ILO, 2016. [Resource kit on gender-based violence in global supply chains.](#)

### Access to natural resources

[Addressing gender considerations in the soy supply chain: tackling gender inequality through responsible sourcing. Soy Toolkit version 1.0.](#) Good growth partnership, WWF, Proforest, GEF.

Both Ends, 2010. [Gender mainstreaming in natural resources management: why and how?](#) This working paper aims to provide CSOs with insights and examples and methods to mainstream gender in their work, specifically in water and land use management activities.



## STEP 3: CEASE, PREVENT, OR MITIGATE GENDER IMPACTS



### Resources providing in-depth information related to specific labour principles

ILO/ Alliance 8.7, 2018, [Ending forced labour by 2030: A review of policies and programmes.](#)

ILO, 2020. [Decent work in garment sector supply chains in Asia. Recommendations for garment manufacturers on how to address the COVID-19 pandemic.](#)

CARE, 2018. Policy brief: [Ending violence and harassment against women and men in the world of work.](#)

RVO and CNV Internationaal 2020. [Violence and harassment @ work. A guide for SMEs to prevent violence in the workplace.](#)

TUC, 2017. '[Gender in occupational safety and health](#)'. A Trade Unions Congress (TUC) guide for trade union activists (with gender checklist) with insights in mitigating measures related to occupational safety and health.



## STEP 4: TRACK IMPLEMENTATION & RESULTS



### Collecting data and social auditing methodologies

BSR, 2018. [Gender Equality in Social Auditing Guidance.](#) This report outlines why and how gender considerations should be integrated into social auditing methodologies and processes.

BSR, 2019. [Making Women Workers Count.](#) A Framework for Conducting Gender Responsive Due Diligence in Supply Chains.

Video recording of a [webinar](#) on 'Making Women Workers Count: BSR's New Framework for Gender-Responsive Due Diligence in Supply Chains'.

UN Human Rights Office of the High Commissioner (UNOHCHR), 2011. [Manual on monitoring, integrating gender Into human rights monitoring.](#)

[Amfori - BSCI : How to integrate gender equality in the DD strategy?](#)



### Traceability

BSR, 2014. [A guide to traceability: a practical approach to advance sustainability in global supply chains](#). This guide explains why it is important to carry out traceability for sustainability purposes, outlines the global opportunities and challenges it represents, and summarises practical steps for implementing traceability programmes within companies.

Fair Wear, 2017. The [Fair Wear Brand Performance Check](#). This is designed to strengthen transparency and accountability of Fair Wear's member companies. It supports assessments and public reporting on how the management practices of member companies support the Fair Wear's Code of Labour Practices at apparel factories engaged in activities that take place after the production of fabric.



## STEP 5: COMMUNICATE HOW IMPACTS ARE ADDRESSED



### Behind the Brands

[Behind the Brands](#) is part of Oxfam's GROW campaign that aims to help create a world where everyone has enough to eat. Posing the question: "what are they doing to clean up their supply chains?" the campaign has developed a scorecard that is entirely based on publicly available information on the policies of the Big 10 (Associated British Foods, Coca Cola, Danone, General Mills, Kellogg's, Mars, Mondelez, Nestle, Pepsico and Unilever). In this way, the campaign seeks to provide consumers with the information they need to hold multinationals accountable for what happens in their supply chains. It takes a deep look at what these companies say they are doing to fight discrimination and to make sure women get a fair deal now and in the future.

### Gender-sensitive reporting

UNICEF South Asia, 2018. [Gender equality and rights. Gender responsive communication for development: Guidance, tools and resources](#).

### Global Reporting Initiative

[Insights in Transparency as a Force for Gender Equality](#). In this speech to commemorate Women's Day 2018, GRI's Deputy Chief Executive, Teresa Fogelberg, spoke about how the empowerment of women and girls is the cornerstone of sustainable development.

### Practical steps on how to integrate gender in sustainability reporting

IFC and GRI, 2009. The report "[Embedding Gender in Sustainability Reporting: A Practitioner's Guide](#)" highlights some of the existing and emerging business drivers for improving practices and reporting on material gender issues. It offers practical steps on how to integrate gender in sustainability reporting.

### Unstereotype Alliance

The [Unstereotype Alliance](#) is a "thought and action platform" that seeks to eradicate harmful gender-based stereotypes in all media and advertising content. Convened by UN Women, the Alliance brings together partners and seeks to collectively use the advertising industry as a force for good to drive positive change all over the world. The Unstereotype Alliance contributes to empowering women in all their diversity (race, class, age, ability, ethnicity, religion, sexuality, language, education, etc.) and addressing harmful masculinities to help create a gender equal world.



## STEP 6: PROVIDE FOR, OR COOPERATE IN REMEDIATION WHEN APPROPRIATE



### Complaints grievance procedures

Fair Wear, 2018. [Fair Wear complaints procedures](#). The complaints helplines of Fairwear.org in major garment-producing countries make sure that workers are listened to and can voice their complaints. This report describes the complaints procedure advocated by Fairwear.org. Also see: [Remediating worker issues](#).

Harvard University & JF Kennedy School of Government, 2008. [Grievance Mechanisms for Business and Human Rights, Strengths, Weaknesses and Gaps](#). Business and Human Rights.org provides an insightful report on some of the strengths and weaknesses of a growing body of extrajudicial mechanisms in the business and human rights arena to which complainants can take their concerns, and the gaps they leave uncovered.

[Compliance Advisor Ombudsman](#) provides a practical guide and some real-life cases for implementing grievance mechanisms in different sectors.

International Commission of Jurists (ICJ), 2019. [Effective Operational-level Grievance Mechanisms. Based on a two-year ICJ study](#) that explored existing practices and policies, this research report provides clear recommendations for the improvement of the design and implementation of Operational Grievance Mechanisms, including a set of Proposed Performance Standards to assist companies and other stakeholders in their work.

Digital tools are increasingly used to report any type of concern or violations in the workplace. However, it is important to bear in mind that digital grievance mechanisms do not only open up opportunities for transparency and inclusion, but they also come with risks. Interesting examples of digital tools are:

[EthicsPoint](#): a whistle blower hotline incident management software: Anyone with concerns about abuse or misconduct in the workplace can file an anonymous report.

[MySafeWorkplace](#): a third-party reporting systems used by brands and companies. Workers can report by phone or online.

## Remedy

The Centre for Research on Multinational Corporations (SOMO) provides tools and resources for professionals and citizens who seek remedy for corporate human rights abuses: [Human Rights & Grievance Mechanisms](#)

ETI, 2017. [Access to remedy - operational grievance mechanisms](#). An issues paper for ETI. Version 2.0 – revised by Laura Curtze and Steve Gibbons.

The [IRBC Agreements](#) website offered the featured theme “Access to remedy”, to provide clarity about the nature of the expectations and to share examples of how they have been put into effect in practice.



Take this quiz with your employees and start a conversation about gender equality in a fun way! You will find 30 questions. Choose a few for a first internal discussion and leave some for another round. Let's see how much you and your teams know about gender equality!

### TEST YOUR KNOWLEDGE ON GENDER EQUALITY NOW!

For example, do you know which company is the top performer when it comes to gender equality? Do you know how much money would be generated if women were to play an equal role in labour markets to that of men? Take the quiz and find out! You can use [Kahoot](#) or [Mentimeter](#) to make this an engaging and fruitful experience for you and your company.



1 Roughly half the world's population still **LIVES** on the equivalent of about ... **A DAY**

- A** \$5.5   **B** \$3   **C** \$65



3 Across the globe, what is the percentage of women representatives in **NATIONAL PARLIAMENTS**?

- A** 23.7%  
**B** 37.8%  
**C** 39.4%



2

Is the following statement **TRUE** or **FALSE**?  
"There are fewer women among chief executives of Fortune 500 companies than there are men named James."

4

What percentage of women hold senior & middle-management positions in the **FORMAL EMPLOYMENT** sector?

- A** Around 22%  
**B** Less than 33%  
**C** More than 55%

5

How many world business leaders say they are in favour of **GENDER QUOTAS** on corporate boards?

- A** 47%   **B** 20%   **C** 76%

6

What percentage of total **GLOBAL NEWS COVERAGE** in 2015 concerned women?

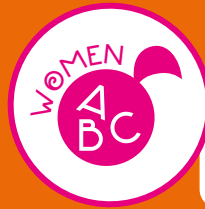
- A** 24%   **B** 49%   **C** 17%



7

If women played an identical role to men in labour markets, what would this contribute to the **WORLD ECONOMY** by 2025?

- A** minus US\$3 trillion
- B** US\$83 million
- C** US\$28 trillion

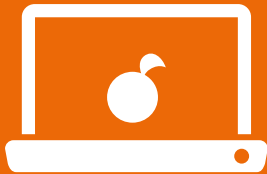


8

Women account for what percentage of the world's **ILLITERATE PEOPLE**?

- A** 24%
- B** 55%
- C** 66%

9



Women are less connected to the **DIGITAL WORLD** than men. The gap is 25% in the developing world, and more in developing countries. If an additional 600 million women are connected to the internet by 2023, by how much would global GDP rise?

- A** between 2 and 3 billion USD
- B** between 13 and 18 billion USD
- C** between 45 and 50 billion USD



10

By what percentage would **AGRICULTURAL** yields increase if women farmers in developing countries had the same access to productive resources (such as land or finance) as men?

- A** 5%
- B** 30%
- C** 80%

What percentage of companies globally do not have an **ANTI-SEXUAL HARASSMENT POLICY**?

11

- A** 84%
- B** 58%
- C** 32%



12

Which country ranks number 1 in the top 10 of the **GLOBAL GENDER GAP** Index of 2020?

- A** Iceland
- B** Norway
- C** Belgium

13

"A truly equal world would be one where women ran half our countries and companies and men ran half our homes."  
**WHICH POWERFUL CORPORATE LEADER SAID THIS?**

- A Sheryl Sandberg (COO Facebook)
- B Antonio Guterres (UN Secretary General)
- C Neelie Smit Kroes (former European Commissioner)



14

Which **COMPANY** is ranked number 1 globally for **GENDER EQUALITY**?

- A Google
- B Coca-Cola
- C Diageo



15

In how many countries globally can **MEN** legally prevent their wives from working?

- A 16
- B 18
- C 2

16

In some countries, it is illegal for women to apply for certain **TYPES OF JOBS**. Which is the correct answer?

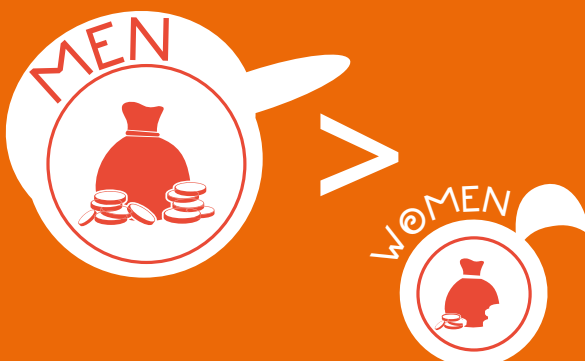
- A Bangladesh: working underwater
- B Moldova: driving buses with more than 14 seats
- C Guinea: working with certain hammers
- D all of the above



17

For every 100 men who are hired and promoted to manager within a company ... women achieve a similar job progression.

- A 66
- B 72
- C 99



18

Globally, how much less do women **EARN** than men, on average?

- A 23%
- B 0,5%
- C 19%



19

What is the % of women having access to financial institutions or have a **BANK ACCOUNT**?

- A** 58% **B** 16% **C** 70%

DID YOU KNOW THAT.....?

QUIZ

20

The International Labour Organization (ILO) requires that women should be given no less than how many weeks of paid **MATERNITY LEAVE**?

- A** 8 weeks  
**B** 14 weeks  
**C** 26 weeks



21

At least one in ... women will experience some form of **VIOLENCE** during her lifetime?

- A** 2 **B** 3 **C** 10

22

In how many countries are perpetrators of rape exempted from prosecution if they are married to, or subsequently marry the victim?

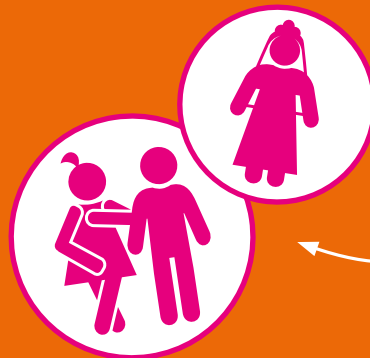
- A** 37 **B** 15 **C** 48



23

How many countries do not have specific laws to prohibit **SEXUAL HARASSMENT** in the workplace?

- A** 4 **B** 18 **C** 68



24

What percentage of women (married or in a union) globally are considered to **FREELY MAKE THEIR OWN DECISIONS** over sexual relations, contraceptive use, and access to sexual and reproductive health services?

- A** 34%  
**B** 49%  
**C** 52%

25

Bangladesh, Brazil, Colombia, Kazakhstan, the Philippines, Turkey and Zimbabwe are ranked among 10 **WORST COUNTRIES** for working people. Which countries were added to this "club" in 2020?

- A** Egypt, Honduras, India
- B** Cambodia, Ethiopia, Guatemala
- C** Pakistan, China, Libya

26

Women bear a disproportionate responsibility for unpaid care and domestic work. How many more times do women spend on **UNPAID CARE** than men?

- A** 0 times
- B** 2.5 times
- C** 5 times



27

Land is perhaps the most important economic asset. Women account for ... percent of **AGRICULTURAL LANDHOLDERS** in the world.

- A** 12.8%
- B** 30%
- C** 50%

28

Globally, how many women **MARRY** before the age of 18?

- A** 10 million
- B** 267 million
- C** 650 million



Which of the following types of leverage are companies least likely to use to decrease **HUMAN RIGHTS RISKS**?

29

- A** provide human rights training to security forces
- B** threaten the political leader of a country to release their private guilty pleasure 80s Spotify playlist
- C** join forces with companies from the same industry to push for improved standards across the supply chain

30

In a poll of fashion-industry executives, ... % said "sustainability targets acted as a guiding principle for nearly every strategic decision they made."

- A** 22%
- B** 52%
- C** 86%



QUESTIONS	RIGHT ANSWER	EXPLANATION
1 Roughly half the world's population still lives on the equivalent of about ... a day	<b>A</b> US\$5.5 a day	US\$650 a day, wouldn't that be fun? Unfortunately, roughly half the world's population still lives on the World Bank defined poverty line of US\$5.5 a day.
2 Is the following statement true or false? "There are fewer women among chief executives of Fortune 500 companies than there are men named James."	<b>A</b> True	It's quite likely that you will never meet a female CEO, but chances are you will cross paths with a Fortune 500 CEO called James. In the 100 Dutch companies, there are more men named Peter (five) than female CEOs (four). The four companies with a female CEO are: Intertrust, PostNL, Wolters Kluwer, and DSM (female co-CEO)
3 Across the globe, what is the percentage of women representatives in national parliaments?	<b>A</b> 23.7%	While still in the minority, women's political representation at national level has increased over the past two decades ( <a href="#">from 13.7% in 2000 to nearly one-quarter today</a> ). In around 40% of countries, this has been achieved through a quota to increase women's participation in politics.
4 What percentage of women hold senior and middle-management positions in the formal employment sector?	<b>B</b> Less than 33%	Women are still underrepresented in managerial positions. In the majority of the 67 countries with data from 2009 to 2015, fewer than a third of senior- and middle-management positions were held by women. Studies have shown that companies and governments perform better when they have greater participation from women.
5 How many world business leaders say they are in favour of gender quotas on corporate boards?	<b>A</b> 47%	Nearly half of global business leaders would like to see more gender equity in leadership and management positions, both in the public and private sectors. Smart! Because research has shown that companies with more women in management positions generate more profit.
6 What percentage of total global news coverage in 2015 concerned women?	<b>A</b> 24%	Women were the subject of 24% of all the news items in 2015, meaning they were interviewed or whom the news was about. This includes print, radio and television. In 1995, women accounted for only 19% of coverage. Currently, only around 4% of news stories are deemed to challenge gender stereotypes.
7 If women played an identical role to men in labour markets, what would this contribute to the world economy by 2025?	<b>C</b> US\$28 trillion	<a href="#">Mckinskey</a> found out that if you consider a "full-potential" scenario in which women's participation in the economy is equal to that of men, this would generate an additional US\$28 trillion by 2025. That is equivalent to a 26% increase in global GDP. What's more, companies and governments perform better when they make more room for women. For example, women's participation in peace processes increased the likelihood of a peace agreement lasting at least two years by 20%, and the probability of the agreement lasting 15 years by 35%. A true win-win.
8 Women account for what percentage of the world's illiterate people?	<b>C</b> 66%	Nearly two-thirds of the world's 781 million illiterate adults are women. In many countries, girls' education is not seen as a priority.
9 Women are less connected to the digital world than men. The gap is 25% in the developing world, and more in developing countries. If an additional 600 million women are connected to the internet by 2023, by how much would global GDP rise?	<b>B</b> Between US\$13 and 18 billion	The GDP would rise by between US\$13 billion and US\$18 billion. The internet is not only about funny cat videos. It is also a place to connect, learn, explore the world, and find new opportunities. Without equal access to technology and the internet, girls and women are not able to equally participate in our ever more digital societies ( <a href="#">Plan International</a> ).
10 By what percentage would agricultural yields increase if women farmers in developing countries had the same access to productive resources (such as land or finance) as men?	<b>B</b> 30%	Not only would women increase the yield by <u>30%</u> , they would also reduce hunger by 17%. They would also spend most of the profits on their families, and so help to address poverty.



QUESTIONS	RIGHT ANSWER	EXPLANATION
11 What percentage of companies globally do not have an anti-sexual harassment policy?	<b>B</b> 58%	<a href="#">More than half of companies</a> globally do not have an anti-sexual harassment policy. In the EU alone, <a href="#">40-50%</a> of women have reported different forms of sexual harassment at work. Not only does this have a negative effect on women in terms of physical and mental stress, it also has negative impacts for business due to, among others, high employee turnover, damage to corporate reputation, consumer outrage, litigation, and a potential fall in stock prices.
12 Which country ranks number 1 in the top 10 of the Global Gender Gap Index of 2020?	<b>A</b> <a href="#">Iceland</a>	The Global Gender Gap index is measured by economic participation and opportunity, educational attainment, health and survival, political empowerment. Iceland runs best for the 11th year. Size, economic power, or even a democratic political system, do not automatically make a country "gender-sensitive". Nicaragua and Rwanda out-perform some of the most progressive countries in Europe.
13 "A truly equal world would be one where women ran half our countries and companies and men ran half our homes." Which powerful corporate leader said this?	<b>A</b> Sheryl Sandberg COO Facebook	Sheryl Sandberg wrote this in 2018, in <a href="#">a Facebook post</a> marking the 5th anniversary of her book, "Lean In". The book discusses the empowerment of women in the workplace.
14 Which company is ranked number 1 globally for gender equality?	<b>C</b> Diageo	<a href="#">Diageo</a> is one of the largest producers of spirits and beers. According to Equileap, with 40% women's representation, the company is getting closer to achieving gender balance at the executive level. Women represent 37.5% of the board, 34% of senior management, and 32% of the workforce. Cheers to that!
15 In how many countries globally can men legally prevent their wives from working?	<b>B</b> 18	This is legal in 18 countries, including for example Bolivia, Cameroon, Jordan, Niger, Sudan and UAE.
16 In some countries, it is illegal for women to apply for certain types of jobs. Which is the correct answer?	<b>D</b> all of the above	In <a href="#">104 countries</a> there are laws that prevent women from working in specific jobs. This affects the employment choice of 2.7 billion women. For example, a girl in Russia cannot aspire to become a train driver, and Argentinian women cannot distil or sell alcohol. No cheers to that.
17 For every 100 men who are hired and promoted to manager within a company ... women achieve a similar job progression.	<b>B</b> 72	A <a href="#">McKinsey</a> study found that for every 100 male staff hired, and promoted to manager, only 72 women are. This results in more women remaining stuck at entry positions. It's no surprise that men account for 62% of manager-level positions.
18 Globally, how much less do women earn than men, on average?	<b>A</b> 23%	The global gender pay gap is estimated to be <a href="#">23%</a> . This means that women earn 77% of what men earn. Without decisive action, it will take another 68 years to close this gap and achieve equal pay.
19 What is the % of women having access to financial institutions or have a bank account?	<b>A</b> 58%	Globally, around 65% of men have an account at a formal financial institution, compared to 58% of women. According to the <a href="#">World Bank</a> : "In developing economies women are 20 percent less likely than men to have an account at a formal financial institution and 17 percent less likely to have borrowed formally in the past year. Even if they can gain access to a loan, women often lack access to other financial services, such as savings, digital payment methods, and insurance."
20 The International Labour Organization (ILO) requires that women should be given no less than how many weeks of paid maternity leave?	<b>B</b> 14 weeks	The Maternity Protection Convention, 2000 (No. 183) provides for 14 weeks of maternity benefit to women to whom the instrument applies.



QUESTIONS	RIGHT ANSWER	EXPLANATION
21 At least one in ... women will experience some form of violence during her lifetime?	<b>B</b> 3	<a href="#">One in three women</a> have experienced either physical and/or sexual violence at some point in their lives. Take a second to think about all the women you know in your life. It's a scary statistic isn't it? It translates to one billion women worldwide. In some countries the number is as high as 7 in 10. Women who have experienced physically and/or sexual violence are twice as likely to have an abortion, and almost twice as likely to experience depression. In some regions, female victims of gender-based violence are 1.5 times more likely to be infected with HIV, or another STI.
22 In how many countries are perpetrators of rape exempted from prosecution if they are married to, or subsequently marry the victim?	<b>A</b> 37	This means that in <a href="#">37 countries</a> it is considered acceptable to rape someone as long as you marry them afterwards, or you are already married to them.
23 How many countries do not have specific laws to prohibit sexual harassment in the workplace?	<b>C</b> 68	Yes, that's right. <a href="#">Nearly one-third of countries</a> worldwide have not made efforts to legally prohibit sexual harassment in the workplace.
24 What percentage of women (married or in a union) globally are considered to freely make their own decisions over sexual relations, contraceptive use, and access to sexual and reproductive health services?	<b>C</b> 52%	Based on available data from 45 countries, the <a href="#">UN estimates</a> that 52% of women can be considered to (theoretically) enjoy autonomy in decision-making over sexual relations, contraceptive use, and access to sexual and reproductive health services.
25 Bangladesh, Brazil, Colombia, Kazakhstan, the Philippines, Turkey and Zimbabwe are ranked among 10 worst countries for working people. Which countries were added to this "club" in 2020?	<b>A</b> Egypt Honduras India	<a href="#">The right to organise</a> is a fundamental labour and human right. Every individual has the right to collective bargaining over employment conditions (such as salary and remuneration, working hours, rest periods and benefits). Unfortunately, workers in many countries face many barriers to organising themselves. It can be very risky to join a trade union in these countries as trade union leaders have lost their jobs, or even their lives, for speaking out against violations of labour and human rights.
26 Women bear a disproportionate responsibility for unpaid care and domestic work. How many more times do women spend on unpaid care than men?	<b>B</b> 2.5 times	Women's contribution to unpaid care and domestic work is vital for a functioning economy because the house is not going to clean itself unfortunately. Most of this work is unrecognized and is not included in economic statistics. It is estimated that if women's unpaid work were assigned a monetary value, it would constitute between 10 and 39% of global GDP.
27 Land is perhaps the most important economic asset. Women account for ... percent of agricultural landholders in the world.	<b>A</b> 12.8%	<a href="#">Fewer than 15%</a> of agricultural landholders around the world are women and 85 % are men. The largest gender inequalities in access to land are found in North Africa and the Middle East, where only around 5 percent of all landholders are women. Women farmers have significantly less access to, and control over land and other productive assets, than men. Women are less likely to have legal documents providing ownership of their plots.
28 Globally, how many women marry before the age of 18?	<b>C</b> 650 million	In 2017 it was found that <a href="#">650 million</a> women worldwide alive today were married in their childhood. <a href="#">12 million girls marry before the age of 18 each year - almost one every 2 seconds</a> . Thankfully, this trend is on the decline in many parts of the world. In the most affected parts of Southern Asia, a girl's risk of marrying in childhood has dropped by over 40% since 2000.





QUESTIONS	RIGHT ANSWER	EXPLANATION
<p>29 Which of the following types of leverage are companies least likely to use to decrease human rights risks?</p>	<p><b>D</b></p>	<p>Unfortunately, this is not public knowledge. What companies <a href="#">can do</a> to increase their leverage is through traditional commercial leverage (e.g. contracting), broader business leverage (e.g. capacity building), leverage together with business partners, bilateral engagement, and multi-stakeholder collaboration.</p>
<p>30 In a poll of fashion-industry executives, ... % said “sustainability targets acted as a guiding principle for nearly every strategic decision they made.”</p>	<p><b>D</b> 52%</p>	<p>There is hope! According to this McKinsey poll, around half of fashion-industry executives said they use sustainability targets as guiding principles for nearly every strategic decision they make. McKinsey also stated that 8 in 10 CPOs have ambitious plans to step up their transparency by 2025. Six in ten plans to take it to another level and share information about their suppliers at the point of purchase.</p>

## ABBREVIATIONS

B2C	Business to Consumers
B2B	Business to Business
BSCI	Business Social Compliance Initiative
BHR	Business and Human Rights
BSR	Business for Social Responsibility
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CLMRS	Child Labour Monitoring and Remediation System
CLV	Customer Lifetime Value
CSR	Corporate Social Responsibility
CoC	Code of Conduct
CSO	Civil Society Organisation
CSR	Corporate Social Responsibility
DMC	Destination Management Company
EBIT	Earnings Before Interest and Tax
ETI	Ethical Trading Initiative
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FoA	Freedom of Association
FWF	Fair Wear Foundation
GAA	Girls Advocacy Alliance
GBV	Gender-Based Violence
GR-HRDD	Gender-Responsive Human Rights Due Diligence
GRI	Global Reporting Initiative
HRDD	Human Rights Due Diligence
HRIA	Human Rights Impact Assessment
IDH	The Sustainable Trade Initiative
ILO	International Labour Organization
IRBC	International Responsible Business Conduct
ITUC	International Trade Union Confederation
IUF	International Union of Food, Agricultural, Hotel, Restaurant, Catering, Tobacco, and Allied Workers' Associations
KPI	Key Performance Indicators
LGBTIQ+	Lesbian, Gay, Bisexual, Transgender, Intersex, Queer, + (other diverse sexual orientations and gender identities)
MA	Maturity Assessment
MNE	Multi-National Enterprise
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organisation
OECD	Organization for Economic Co-operation and Development
R&D	Research & Development
RMG	Ready-Made Garment (industry)
SDGs	Sustainable Development Goals
SER	Social and Economic Council of the Netherlands (Acronym in Dutch)
SMEs	Small- and Medium-sized Enterprises
T&H	Tourism & Hospitality
UN	United Nations
UNGC	United Nations Global Compact
UNGP	United Nations Guiding Principles
UNWTO	United Nations world Tourism Organisation
UNHLP	United Nations Secretary-General's High-Level Panel (on Women's Economic Empowerment)
VSLA	Village Savings and Loan Association
WEP	Women Empowerment Principles

This is a publication of Plan International Netherlands  
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December, 2020

## PART 2

FOR LEARNINGS FROM PRACTICE, SHOWING HOW GR-HRDD IS APPLIED IN  
PRACTICE, SEE THE REPORT, PART 2.

## PART 3

FOR EACH OF THE SIX STEPS OF GR-HRDD THIS WORKBOOK PROVIDES YOU WITH  
PRACTICAL CHECKLISTS TO HELP YOU ASSESS YOUR CURRENT GR-HRDD PROCESSES  
AND IDENTIFY POINTS FOR IMPROVEMENT.

# GIRLS ADVOCACY ALLIANCE



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Development Cooperation  
Ministry of Foreign Affairs of the Netherlands

The Girls Advocacy Alliance is one of the strategic partners of the Dutch Ministry of Foreign Affairs in the Dialogue and Dissent framework.