Ethical Trading Initiative

Respect for workers worldwide

Base Code Guidance:

Gender equality (B)

Gender and human rights due diligence

Lead Author: WISE Development

Photos ILO, ETI

1. Introduction 2
2. Commitment: Building company leadership and commitment to gender equality and women's rights 10
3. Assessment and Analysis: Guidance on a graduated approach to gender assessments 12
3.1 Pathway 1. Analysis 'Looking in' 12
3.2 Pathway 2. Analysis 'Looking out' 13
4. Action 18
4.1 Pathway 1. Action 'Looking in' 19
4.2 Pathway 2. Action 'Looking out' 20
5. Track and Communicate 27
Annex 1. Example monitoring indicators 29
Endnotes 29

1. Introduction

Making global business more inclusive and empowering for women workers as well as realising the business benefits from this, requires a multi-layered approach based on partnership and collaboration at all levels of the supply chain.

This document provides guidance for companies on how to meet their corporate responsibilities in relation to respecting women workers' rights and reporting against these obligations.

Drawing on the ETI Human Rights Due Diligence (HRDD) Framework, it provides information on how to move beyond a "do no harm" approach, and towards integrating gender equality and women's rights more explicitly into due diligence risk assessment processes, and using this to strategically inform businesses actions that lead to greater respect for women worker's rights.

More specifically, it aims to guide companies on (see figure 1):

(i) how to integrate a gender sensitive approach into their **due diligence assessments**

(ii) what to consider when integrating **gender equality at corporate and decision-making levels**

(iii) how to design and implement **gender transformational activities** that will enhance women's rights, and

(iv) how to **monitor and report progress.**

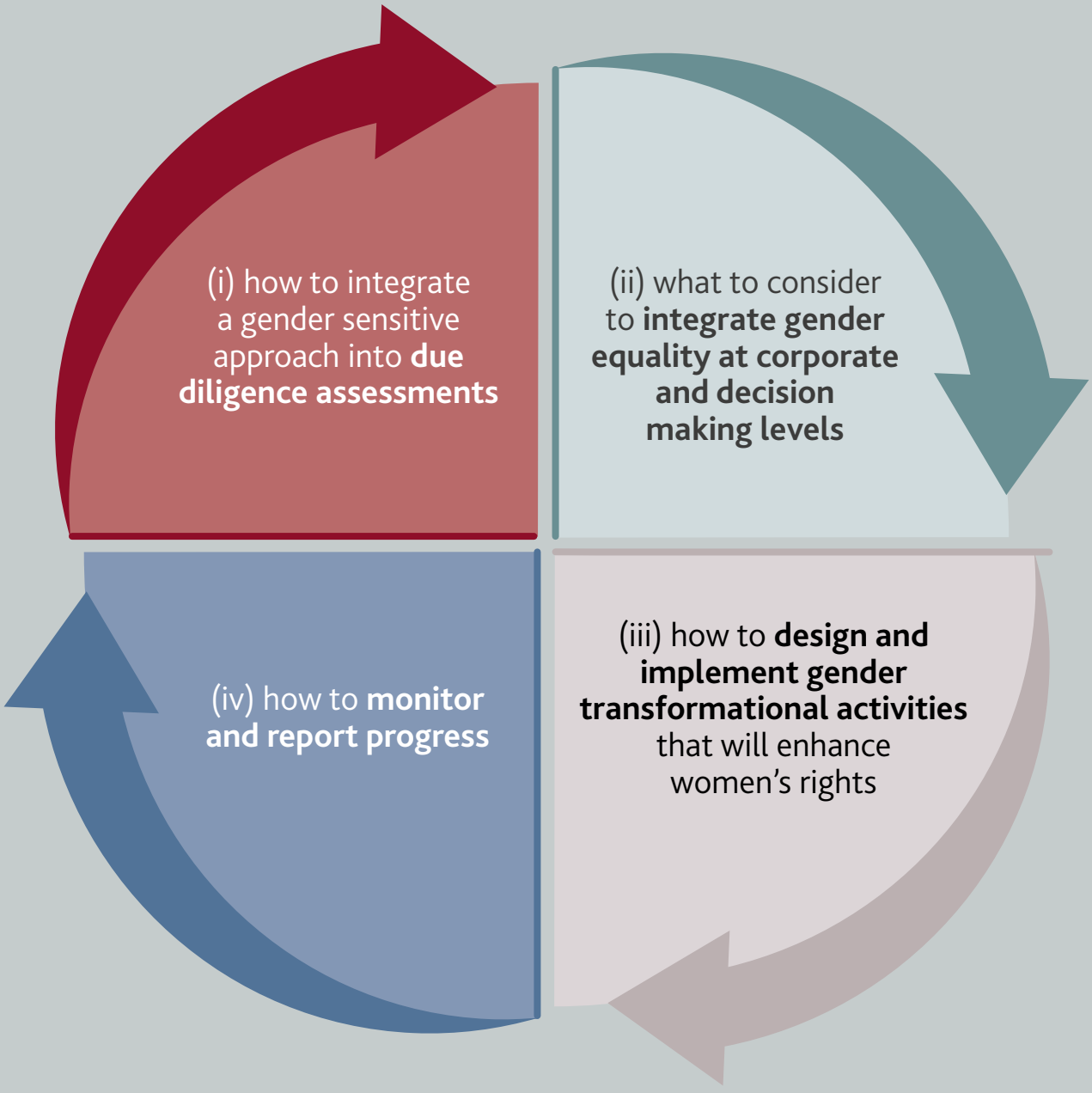
Reminder: What is human rights due diligence?

Human rights due diligence is the action taken by a company to identify and act upon actual and potential risks for workers in its operations, supply chains and the services it uses. Due diligence is an essential step in respecting workers' human rights as promoted through the UN Guiding Principles on Business and Human Rights.

ETI's approach to human rights due diligence is based on multi-stakeholder engagement and processes that include:

- Assessment of actual and potential human rights risks
- Identification of corporate leverage and responsibility for decision-making and actions needed
- Mitigation of risk and remediation for workers impacted by human rights violations
- Monitoring, review, reporting and continuous improvement.

Figure 1: Human rights due diligence process in relation to gender equality



The guidance is structured around a roadmap that is mapped against the due diligence process and can be implemented as part of that process or as a separate workstream as required.

The guidance also proposes two additional steps that are not part of the due diligence process, but which are fundamental:

(i) **Leadership and corporate commitment to gender equality and women's rights** needs to be agreed at the highest levels in the company **before** work starts. As achieving gender equality requires a shift in power relations and structures, leadership is needed to drive the initiative for it to be successful. For example, undertaking a gender equality assessment or analysis can be challenging if leadership is not on board and pushing for it to happen.

(ii) **Work on gender equality and women's rights should take place both within the company (headquarters and offices) and within supply chains**. Work on supply chains and with external organisations including unions and civil society on gender equality needs to be underpinned by an internal culture and company-wide policies that demonstrate leadership on gender equality.

Figure 2 summarises the two proposed pathways towards a gender inclusive business, with figures 3 and 4 providing an overview of the steps that companies should take along each of these pathways in relation to four key areas:

- **Commitment**: Secure leadership commitment towards gender equality and social inclusion
- **Assessment and analysis**: Understand the importance of context; undertake gender equality analysis to understand the issues and inform strategic approaches that address root causes not just symptoms of inequality
- **Action**: Prioritise and support women workers' own voices, knowledge and perspectives including through engaging with trade unions, local organisations (especially women's rights organisations); take a rights-based approach; work with men and women; collaborate with others, and; take a long-term approach
- **Track and communicate**: Collect and analyse gender-disaggregated data; regularly review and reflect on gender and inclusion efforts and integrate the lessons into current and future initiatives.

The rest of this document provides details for each area. It should be used in conjunction with Part A of the guidance, which summarises the gender-related issues and potential human rights risks for women workers in global supply chains for each of the ETI Base Codes. This can be used to guide the initial assessments and analysis.

Figure 2: Pathways towards a gender inclusive business

Senior and corporate commitment to gender equality and women's rights

- **Internal buy-in** across the organisation
- **Policies** to reflect the ambition of becoming a gender equal and inclusive organisation
- **Strategy** that aligns with the vision and broad priorities of the organisation
- **Effective governance** at senior management level to ensure accountability
- **Sufficient resources (financial and human)** allocated for gender-related activities

1. **Looking in**: Internal company gender assessment and strategy

2. **Looking out**: Supply chain analysis and strategy

Figure 3: Roadmap for 1. "Looking in" – Internal company organisational and systems gender assessment and strategy

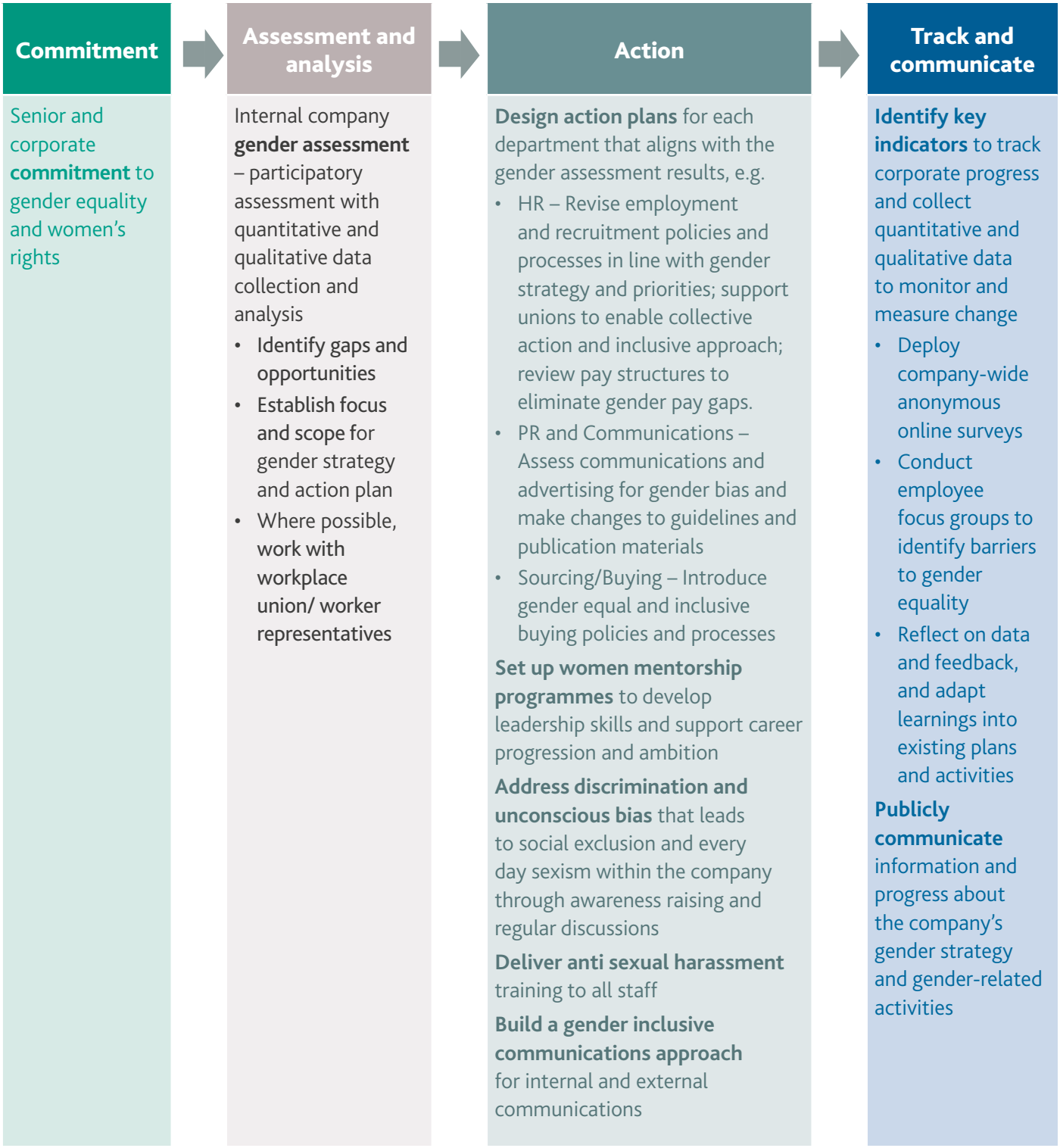


Figure 4: Roadmap for 2. "Looking out" – Gender equality and respect for women's rights in supply chains

Commitment	Assessment and analysis	
Senior and corporate **commitment** to gender equality and women's rights	**Identify countries to focus on and review their gender data** based on • Severity and likelihood of issues and risks • Laws and legal protection for women's labour rights, operation of trade unions and women's organisations • Gather qualitative data to understand cultural practices that affect the workplace	**Build country/ international database -** starting with country database of gender equal and inclusive organisations and supportive organisations (e.g. NGOs, women's rights organisations)
	Supply chain mapping of where men and women are working and their roles. If possible collect data on wages, working hours, and training opportunities etc.	**Develop understanding and assess risks of women workers' situation in lower tiers of the supply chain,** particularly in subcontracted workers and homeworkers
	Conduct participatory supplier level analysis with male and female workers, management, local NGOs and unions • Identify key areas for action based on women's needs as per the base code	**Review supplier HR policies, management systems** and processes for gender inclusion and respect for women's rights
		Assess women's inclusion in relevant union activities, worker representation and collective bargaining

Action

Engage with key strategic suppliers on gender equality

- Establish overall concepts and business case
- Assess gender knowledge and capacity
- Establish a workplan with deliverables and monitoring processes
- Share learnings and success stories from other suppliers

Develop initiatives to support women with **unpaid care** and household work time pressure

- Flexible working hours
- Creche in the workplace

Support **capacity building** for suppliers and workers on gender equality through training and awareness raising workshops

Tackle violence against women in the workplace:

- Training and education in the workplace (on ETI Base Code, local law, sexual and reproductive health rights etc.)
- Establish gender sensitive grievance mechanisms
- Provide effective remediation including health services, psychosocial support, counselling
- Suspend or remove perpetrators and provide compensation to victims

Enable women's collective action and voice

- Encourage women's leadership and representation in management and trade unions
- Enable negotiation with management for a range of Base Code related issues

Training for **women leaders and programmes** to bring more women into management in employment and participation in unions

Develop **partnerships** across and between stakeholders at different levels

Track and communicate

Collect and track data on delivery of activities and outcomes. Indicators could include:

- Measures of women's confidence and agency
- Staff turnover and changes in productivity
- Percentage of women supervisors and managers compared to proportion of workforce
- Incidences of sexual harassment in the workplace that are reported

Share data and learnings with other suppliers, unions and women's organisations and discuss progress.

- Act on feedback to adapt the approach
- Communicate widely among workers
- Build case studies on success stories and share with other brands for cross-learning

2. Commitment: Building company leadership and commitment to gender equality and women's rights

While many businesses may have senior and board level commitment to gender equality and women's rights already, those that do not aim to secure this before starting the work. There are commonalities between both Pathway 1 and Pathway 2 for securing commitment to gender equality and women's rights, so the approach is presented as one.

Key aspects of building senior and board level commitment internally could include:

(i) **Presenting the business case for gender equality and women's rights within your company and in the wider world.** This may involve producing background evidence for the business case both internally and in the supply chain (see Figure 5 below and section 2.1 in Part A of the Guidance).

(ii) **Building senior management and board level capacity, understanding and buy-in of gender equality and women's rights and the issues that might affect your supply chain.** This might involve running a series of workshops to build understanding of underlying gender norms in the company and any latent discrimination in the system. It can also enable the development of policies and strategies that reflect the ambition of becoming a gender equal and inclusive organisation.

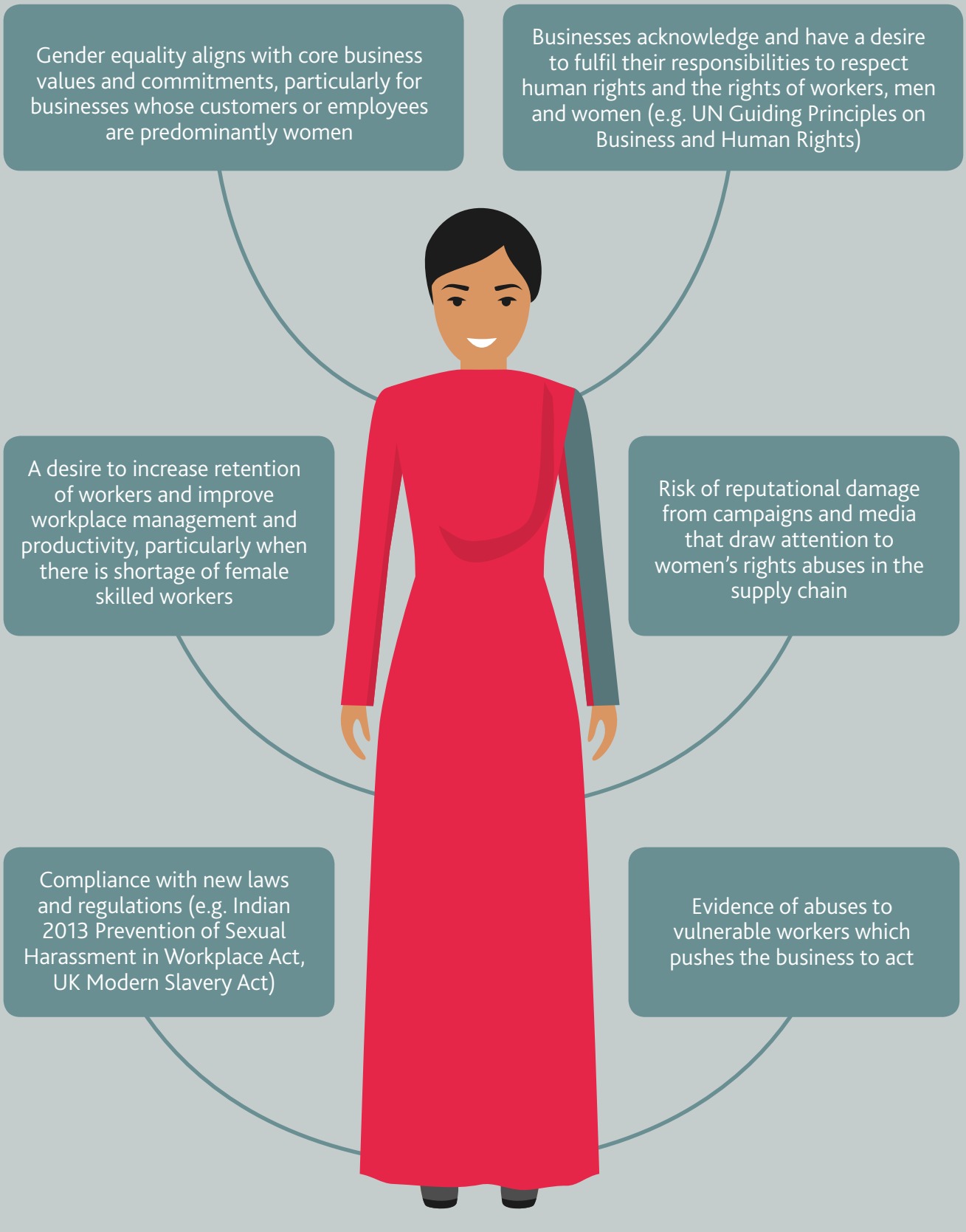
(iii) **Building a process that will ensure continued internal dialogue on gender equality and women's rights at a senior level.**

(iv) **Appointing gender champions in each department** to ensure accountability and feedback of information upwards to senior management and board level and into company management processes and culture.

For the supply chain:

(v) **Initiating conversations with key targeted suppliers** to understand their approach to gender equality (if any), where women are in the organisational structure, and whether women have any decision-making capacity.

Figure 5: Common reasons for business interest in gender equality in supply chains



3. Assessment and analysis: Guidance on a graduated approach to gender equality assessments

Undertaking a gender equality analysis of the supply chain, and of internal business practices, and understanding the ways in which both are shaped by wider labour market dynamics helps to reveal the situation of women and girls at different levels. It also highlights the differential needs of women and men, the impact of workplace conditions and practices on them, and the extent to which their rights can be protected. Such analysis can identify the kinds of actions that are needed to support gender equality, and to anticipate the types of consequences this might have for female workers. The assessment and analysis stage is also critical for explaining to staff and other supply chain stakeholders why gender-related work is necessary, and create buy-in.

3.1 Pathway 1. Analysis 'Looking in'

Pathway 1 should usually begin with an organisational and systems gender assessment and analysis followed by the development of a strategy and action plan to integrate approaches for enhancing gender equality and women's rights across all business functions. It establishes a baseline, identifies critical gaps and challenges and suggests ways of promoting changes at all levels. Organisations can choose to conduct this assessment with varying levels of depth, but they usually include some or all of the following elements:

- Quantitative data on salaries, seniority, roles etc in relation to gender
- Review of policies and procedures – particularly for human resources but also for other business processes, ensuring that core business practices enable rather than undermine women's rights
- Status of industrial relations in the workplace and whether any Collective Bargaining Agreements (CBA) are in place;
- Qualitative data collection for assessing social norms around gender and inclusion, and gauging people's experience, opinions and unconscious bias[1] - using participatory methodology. This can be a useful way of kicking off internal social dialogue
- Analysis of organisational power, leadership and gender dynamics
- Assessment of internal gender expertise, competence and information
- Assessment of communications and advertising products and messages.

After the assessment and analysis, an internal dialogue is needed to decide which issues should be addressed and how to prioritise.

3.2 Pathway 2. Analysis 'Looking out'

Assessments of gender and inclusion issues in the supply chain can take some time and will depend on the size of the companies in the supply chain, the country context and the type of relationships between lead buyers, first tier suppliers, and suppliers further down the chain. Companies may choose to start the process with some relatively basic data collection and then progress onto a more complex analysis of the situation for a particular supplier or group of suppliers. Here is a summary of potential stages:

(i) Desk-based mapping and review of country data to identify risks related to gender equality – this can include a request for data from supply chain companies. It will be important to take into account the following:

- **Severity of potential and actual risks** and known abuses of women's rights
- **Business leverage potential within the supply chain** – which might inform how much buying power and/or relationships the business has to influence the behaviours of local managers. This can also help to provide evidence for working with chosen suppliers.

Data collected can include:

- **Information on who is working in the supply chain**, and which workers are most vulnerable to the risks outlined in Part A. Document where informal women workers or home-based workers are or might be concentrated in the supply chain (see Guidance Box 1). If possible map the seniority (e.g. supervisors, managers) and pay differentials of men and women in the supply chain companies.
- **Country progress towards gender equality and women's rights**: Check latest human rights reports (including CEDAW); Social Institutions and Gender Index (SIGI https://www.genderindex.org/); check discriminatory laws and practices (women, migrant workers, minorities, people with disabilities etc.); check laws that relate to equal labour rights for men and women (ILO Conventions[2]) and government monitoring of women's rights; check if trade unions, women's organisations and women's rights defenders are allowed to operate without threat, harassment or constraint.
- **Existing efforts and initiatives** by other companies, suppliers, trade unions, other collective associations and individual women human rights defenders, to engage with issues of gender inequality.

This should be followed by internal decision making about focus of further targeted data collection, analysis and action.

Guidance Box 1: Where are women working and what are the risks by sector?

- Understand where women's work is concentrated (sectors, roles and geography), and what work is viewed as a "woman's" occupation, e.g. possibly related to women's care roles in many cultures or to social norms and beliefs about what women are good at (or better than men at) or not good at. This role segregation needs to be understood as it can be negative for the company's productivity and innovation. Relegating people to specific roles because of assumptions and beliefs that are most likely not true means that they will not be fulfilling their potential.
- Build an understanding of the specific risks by sector. For example, the agriculture sector might have more informal or day work, seasonal, part time or quantity-based contracts. How does this promote or undermine gender equality? Is there access to social protection as part of these contracts? Is there provision for maternity leave or time off for pregnancy related health clinic visits?
- Understand the differentials in power dynamics between men and women – supervisor and other leadership roles, human resource management roles. Risks associated with overwhelming power being held by one particular group (e.g. men, or men of a particular ethnic group) can silence women in the workplace and mean they are unable to speak out when there is poor treatment or harassment.
- Assess whether sub-contracted workers, agency workers or homeworkers might face specific risks due to the lack of contact with the actual employer (they have to manage the contract through recruitment agencies).

(ii) Participatory gender assessments and analysis. The design of any assessment should pay attention to **who is consulted; how the information is gathered, and how the data is used to inform** decision-making (see Guidance Box 2). The first phase of analysis may only concentrate on the first or second tier of the supply chain and might be focused on workers and their situation in relation to the type of work they do, access to resources, power and agency (see Guidance Box 3). More in-depth analysis and analysis of lower tiers of the supply chain can be conducted with an adapted assessment approach. In supply chains where the potential for subcontracted and/or homeworkers is high, understanding of the risks they face is crucial.

Case Study 1: Understanding women's participation in supervisory roles

In 2017, Debenhams surveyed some of its supplier factories in Bangladesh to explore women's attitudes towards occupying supervisor positions. The survey found that the percentage of male supervisors in a factory ranged between 76% to 100%, even though the length of service for male and female workers was similar. The survey revealed issues around women's lower level of education, lack of support from their families and restrictions on interacting with men – as affecting their ability to aspire to management positions. Interestingly, women workers also said that they did not feel there was an economic incentive to apply for supervisor positions, as they could earn more through working overtime. However, Debenhams acknowledges that these responses must be understood within the broader context of the constraints on women's agency, as well as their unpaid care responsibilities. The company plans to do further research with the aim of supporting women within their supply chains who wish to pursue supervisory roles. There will also be efforts to draw on learning from other existing factories that have high numbers of women already in supervisory roles.

Guidance Box 2: Practical tips for conducting a gender assessment

- All data should be disaggregated by gender
- Include male and female stakeholders at all levels – workers, management, union representatives, recruitment agents as well as key informants from government authorities. The assessment should include different types of women – for example young and older women, single parents, migrant women, widowed women
- Work with trained researchers, with knowledge of the local context, experience of working with vulnerable groups and collecting data on sensitive issues such as sexual and reproductive health, and violence against women and girls, and an understanding of the importance of ensuring confidentiality and anonymity
- Provide safe spaces for women workers to be heard away from supervisors and management. Do not put workers at risk of retaliation
- Where a direct conversation is not possible (e.g. when trying to access workers at the lower levels of the supply chain), secondary information can be gathered from key local informants, including trade union representatives (in the countries where trade unions are active), local women's organisations working on workers' rights or violence against women and community representatives
- Seek collaborative opportunities with other businesses, or with other actors – trade unions, local NGOs, donor programmes, academic institutions.

Guidance Box 3: Gender assessment topics focusing on women's work patterns, access to resources, power and agency

- Women's working patterns (e.g. part time, day work, full time, overtime) and the levels of formality (e.g. formal contracts and social security access)
- Social norms and practices around women's unpaid care and household responsibilities, and how this might affect their work
- Women's inclusion, voice and decision-making power within unions or other worker representative organisations that would enable women to represent their specific gender-related issues within collective bargaining. They can sometimes be missed by male dominated unions
- Women's access and ability to make use of grievance mechanisms
- Discrimination against women or a culture that does not recognise the discrimination, sexual harassment and other risks that women face.

Case Study 2: Understanding the views of vulnerable workers

Drawing the Line is a participatory tool which Primark is using to understand how workers in its supply chain feel about their working lives. It involves groups of 10 to 15 workers sorting through a set of cards depicting various workplace situations and rights in simple language, accompanied by pictures for less literate workers. These include, for example, 'I am supported by my co-workers and managers at the factory', or 'I have proper equipment and clothing to keep me safe at work'. A facilitator uses a gaming approach to get workers to discuss and sort the cards into 'most important', 'important' and 'least important' piles, and then divide the most important cards into 'have' and 'don't have'. Primark has used the exercise to gain insights into workers' views and priorities; and workers have also built trust in each other and started to think and work collectively around priority issues. *Drawing the Line* does not have a specific gender focus, but by grouping workers by sex and age (as well as other relevant lines of differentiation in the particular context), it can be used to explore and expose gender-related issues. For example, Primark has purposefully used it with young women workers, as they represent a large proportion of ready-made garment workers, are among the most vulnerable, and often lack confidence to speak up.

Guidance Box 4: Women workers at greatest risk of human rights abuses

- Young women and girls, older women
- Women of minority or marginalised religious or ethnic groups
- Transgender women
- Lesbian and bisexual women
- Pregnant women and mothers (particularly single mothers)
- Domestic workers
- Migrant women workers
- Seasonal, piece rate, agency or day workers
- Women home-based workers (often without formal contracts)
- Women with disabilities, including mental health disabilities. This might include women who have experienced trauma as a result of conflict and humanitarian contexts, intimate partner violence or sexual violence and/or harassment

(iii) Organisational and system gender assessment in supply chain companies

This stage of the assessment would generally be conducted when a long term and in-depth relationship exists or has developed and when the supplier company has a strong commitment to achieving a gender equal and inclusive organisation. This stage focuses more on the policies, systems, structure and culture of the supply chain company. Supplier companies can be encouraged to also use this approach to conduct a self-assessment. This stage can also include building an **understanding of women's opportunities to participate in unions, collective bargaining and worker representation.**

Guidance Box 5: Organisational and system gender assessment of suppliers

- Assess HR policies to see whether there are any specific policies committing to gender equality and equal opportunities, and whether they reflect an understanding of the specific barriers or challenges that women face in the workplace – e.g. on equality and right to employment for pregnant women, equal pay for work of equal value, maternity leave and pay, flexible working patterns, access to training and promotion, access to contraception, etc.
- Review recruitment processes to understand the level of formality or informality and whether it is fair and non-discriminatory towards women. Recruitment practices that are more informal, such as through supervisors or agents, might present a number of risks for women, and these need to be understood and addressed
- Understand whether complaints and redress systems and processes are collectively negotiated, accessible, transparent, objective, widely communicated and understood. Are women able to submit complaints without fear of reprisal? Are complaints acted upon in a timely and sensitive manner, and protect women from any reprisal?
- Review contracts to see whether they provide enough support for women's reproductive roles while at work.

4. Action: Concrete steps for addressing gender inequality in the supply chain

Based on the findings from the assessment and analysis, companies may decide to implement activities or projects that enhance women's capabilities within the workplace without working on systemic issues, for example by providing sexual and reproductive health services, or access to financial services. This can be a useful way of gaining some quick progress. However, these projects may not necessarily address the root causes of inequality and women's exploitation in the workplace. They are also less likely to build wider sustainable change in power relations, systems and practices.

Case Study 3: Providing health services

As part of the HerHealth project, the International Planned Parenthood Federation (IPPF) Member Association in Ethiopia, the Family Guidance Association of Ethiopia (FGAE) set up clinics for workers at the Kombolcha Textile Factory, delivering a wide range of sexual and reproductive health services. In less than four years, the partnership saw new cases of sexually transmitted infections and HIV infections reduced to almost zero, an increase in uptake of voluntary, modern family planning methods from 11 per cent to 90 per cent, dramatic reductions in unintended pregnancies, and improved access to quality antenatal and obstetric care, all leading to a significant reduction in maternity and sick leave costs.

4.1 Pathway 1. Action 'Looking in'

Companies should aim to improve their own policies, systems and operations with respect to gender equality and social inclusion if they are to better support their supply chain in this aspect. A change in attitudes around gender equality may take time to achieve so companies can do the internal and the supply chain work simultaneously.

Work on systems and processes will require a strong commitment from leadership to build a gender equal and inclusive organisation. A common starting point is the development of a gender strategy and action plan that aligns with the results of the gender assessment. Activities in the action plan should be timebound and include measurable targets for each department. Activities and measurement should be integrated into normal business working practices wherever possible, rather than adding on "gender" specific activities. Examples include:

- **HR** - Revise employment and recruitment policies and processes in line with gender strategy and priorities; supporting unions to enable collective action and inclusive approaches; review pay structures to eliminate gender pay gaps.
- **PR and Communications** – assess all communications and advertising for gender bias and make changes to guidelines and publication materials
- **Sourcing/Buying** – introduce gender equal and inclusive buying policies and processes which aim to understand the impact on both women and men workers.

To drive the internal work, it is advisable to have at least one person in the organisation who has some gender expertise and understanding. This can be complemented with a gender task force or working group who would be responsible for policy development and implementation across the organisation. Where possible, companies should work with their trade union representatives to shape the action plan.

There are certain minimum standards that all companies should adhere to, for example, a living wage, secure contracts, women's right to organise, equal pay for equal work, protection from violence and sexual harassment, paid maternity, paternity and medical leave, support for childcare services, and equal opportunities and non-discrimination in the workplace.

However, there is also a need to work on organisational social attitudes and behaviours, informal and formal rules and unconscious bias related to gender equality and social inclusion. This work can be done through workshops and social dialogue[3].

Consider the following organisational support for the gender work:

- **Build women's capacity and leadership potential**, ensuring that intersectionality is considered and that all women in the business have opportunities to progress upwards
- **Address discriminatory policies or attitudes** that lead to social exclusion and every day sexism within the company and include discussion in routine meetings. This can be done through training and awareness workshops, review of policies and procedures
- **Set up women mentorship programmes** to develop leadership skills and support career progression and ambition
- **Deliver anti sexual harassment and equality training** to all staff
- **Develop the capacity of line managers and eventually all personnel** to: (i) understand and feel comfortable talking about gender equality issues; (ii) use empowering management practice - that includes respectful and non-violent communication skills, listening skills, ability to recognise power and understand when power is misused and ability to delegate and mentor in a way that empowers staff and builds resilience.
- **Build an inclusive communications approach** for internal and external communications. Communications on gender mainstreaming should not just be confined to publicising policies, but also communicate progress and ensure dialogue.

4.2 Pathway 2. Action 'Looking out'

(i) Feasibility of gender work with supply chain actors and making choices

Before deciding on the type of activity to undertake with supply chain actors (whether direct projects or more sustainable work that addresses systemic issues related to gender inequality), it is important to assess the kind of relationship the company has with suppliers (and vice versa), and the context within which they will be working – drawing from the first and second stages. It is advisable to ensure leadership commitment in the supplier company before beginning this work. Guidance on this can be seen in Section 2.

(ii) Using data from the analysis, work with supplier companies to update policies that integrate gender equality and women's rights

The development or strengthening of policies should be accompanied by strategies which outline goals, desired outcomes, resources, partners and a framework for tracking progress.

- Establish overall concepts and business case
- Agree specific targets and a workplan with suppliers that ensure continued monitoring and assessment of gender integration into company practice
- Ensure definitions and monitoring processes are carefully defined and agreed
- When working on human resources issues and grievance mechanisms, add clear and transparent processes, ensure there are no consequences for speaking up and clarify circumstances when contracts might be terminated (e.g. when a serious offence such as sexual violence is committed).

Guidance Box 6: Building an understanding of the feasibility of gender work with supply chain actors

- Analyse the corporate buying power and relationship with suppliers so that it is clear what can and cannot be achieved with respect to gender equality and women's rights in the supply chain. This might involve starting action in a particular country and then building the scope of the effort strategically through different supply chains
- Identify whether there are other brands that can collaborate on activities to increase leverage and impact
- Design action jointly with targeted suppliers and trade unions where present so that there is buy-in from the start
- Consider any increased risks that the company might have generated for women workers – for example, if the buyer is driving down buying prices, this might inadvertently affect how women are treated within the workplace and whether a fair wage can be paid.

Guidance Box 7: Policies and working practices that can support women workers' wellbeing and decent work

- Based on the assessment ensure working practices are adapted and updated in order to better protect women's rights and to promote gender equality and social inclusion in the workplace. This might include changing recruitment practices to avoid unconscious bias and/or discrimination; updating human resources policies to ensure women have the same opportunities and rights as men and that their specific needs (such as paid maternity leave) are satisfied; flexible working hours; no forced overtime, and; transport to/from work
- For women who have experienced violence in the workplace, ensure they are able to take paid leave and access adequate health services (e.g. counselling, emergency contraception, etc.)
- Provide access to sexual and reproductive health services, adequate sanitation facilities for women and sufficient breaks
- Consider how best to enable child care (either through a creche and adequate breaks, or visits during the day).

(iii) Develop and deliver gender equality and women's rights training

Gender equality and women's rights training for women and men workers, management, as well as recruitment agents should be provided to raise awareness of the issues and ensure a wider understanding. Training should build understanding of what is enshrined in national and international laws, as well as in organisational policies and procedures, rights to freedom of association and collective bargaining, expected behaviours and feedback and grievance processes.

- **Build capacity on gender issues, organisational policies, and gender-sensitive approaches.** This can take the form of training sessions for female and male staff at all levels of the business, as well as routine gender-sensitive communications with recruitment agents and contractors. Training should cover the ways in which both women and men are affected by gender relations in the workplace, as well as in wider society. Consider specific training for women on leadership, communication and negotiation skills, navigating male-dominated spaces and processes, building networks, and managing issues such as violence and harassment. Consider providing segregated training for women – particularly during the early stages – to give them a safe space to discuss the issues they face, and build solidarity and confidence to discuss the issues more widely.
- **Support women's participation in training, meetings and decision-making processes using a gender-sensitive approach.** Decide on the location the venue and timings of such meetings, with their needs in mind. Consider using existing safe spaces where women, and particularly those from marginalised groups, feel familiar and comfortable. Explore conducting such activities in partnership with trade unions, other worker representation platforms and women's organisations or collectives.

Case Study 4: Providing life skills training – GAP's PACE programme

GAP's Personal Advancement and Career Enhancement (PACE) factory-based programme aims to provide women garment workers with life skills education and technical training. The life skills component consists of 65-80 hours of learning over an 8-10 month timeframe, and includes eight modules: communication; problem-solving and decision-making; time and stress management; water, sanitation and hygiene; 'execution excellence'; general and reproductive health; financial literacy; and legal literacy and social entitlements. The Execution Excellence module teaches workers how to apply their newly learned skills, particularly in the workplace. Issues of safety and security are integrated across all the modules. The programme has been designed to ensure participatory learning and uses methodologies such as role plays, simulation exercises and brainstorming. In some settings, the programme includes peer-to-peer learning and sharing sessions. Since it was first launched in 2007, evaluations in Bangladesh, Cambodia, China, India, Indonesia and Vietnam have found evidence of higher productivity amongst participants, improved communication, a better, more collegial workplace environment, higher self-esteem, improved knowledge of health and improved financial capacity. At one factory in Indonesia, PACE women produced on average 10% more garment pieces per hour than non-PACE women. In Cambodia, there was 66% greater retention among PACE participants compared to all female garment workers in the factory. In one factory in India, PACE women's productivity at work was 15% higher than women who did not participate.

(iv) Design gender-sensitive and safe grievance and remediation mechanisms. Consider the following:

- A mechanism that is well resourced to investigate submissions where necessary, allows workers to submit complaints, recommendations or comments and observations regarding the gender dimensions of their experience in the workplace; follows up on any actions taken and communicates these to workers.
- Ensure anonymity and/or confidentiality particularly for sensitive issues such as gender-based violence and sexual harassment, and women's reproductive health. Women may also want to raise in-confidence issues around pay and occupational safety.
- Assure workers that it is fair, confidential and independent by publicising its operational protocols, the skills and gender composition of its staffing and then communicating the successful resolution of complaints. It is likely that building trust particularly amongst women workers will take some time.

Case Study 5: Establishing a grievance mechanism – an example of learning and innovation

Building on learning that resolution of grievances can be compromised by organisational dynamics and politics, a project jointly undertaken by several brands, Christian Aid, Vodafone and Treble Partners in Delhi, Bangalore and Chennai includes a grievance resolution component as required by the Indian Prevention of Sexual Harassment at the Workplace (Prevention, Prohibition and Redressal) Bill (POSH) 2013 (which requires the establishment of Internal Complaints Committees in the work place) and UK Modern Slavery Act requirements on due diligence. Aiming to reach 10,000 workers (male and female) in 10 factories, the project provides training to senior management and supervisory staff as well as workers on gender equality and empowering women workers. The electronic complaints mechanism is available at a freephone number and in four languages. A worker who calls is asked a series of multiple choice questions. The grievance is registered, and a human rights dashboard is updated in real time. Progress on resolution of issues is monitored by a local partner organisation Goodera (formerly Nextgen) which runs and monitors the dashboard and is independent of the factory involved. Updates on resolutions are sent to workers via SMS. Workers have the right to challenge a resolution if they are not satisfied. It is currently too early in project implementation to see results.

Guidance Box 8: Mitigating women's rights abuses

- Ensure women who have been subjected to cruel or inhumane treatment are provided with effective remediation – for example health services, psychosocial support or counselling
- Ensure women are protected from harm during any investigation
- Provide compensation for any loss of earnings or trauma that has been experienced and ensure no discrimination or stigma results from the incident or practice (e.g. for issues of sexual harassment the victim can sometimes be stigmatised by other staff)
- Ensure that there are women supervisors and line managers in the company who can listen to and investigate sensitive grievances and that they are properly trained to conduct interviews
- Ensure that all grievance reporting is independent of line management and that women have no fear of reprisal from anyone in their direct line of management or from colleagues
- Consider how to use ICT to make sure grievances can be reported in confidence if necessary.

Case Study 6: Addressing harassment and violence

Launched in 2016 in Bangladesh, BSR's HERrespect project aims to address harassment and violence (emotional, physical and sexual) experienced by women workers both in the workplace and in their personal relationships. Research done by ICDDRB found that emotional violence (verbal abuse, scolding, and insulting in public) is common in garment factories; that there is general acceptance among female workers that sexual violence will occur; and middle-level managers are the main perpetrators of violence because they consider it the best way of pushing workers to meet targets. The project's capacity building component includes critically reflecting on gender norms, building skills in preventing and tackling violence, and engaging in joint sessions between workers and management. A small community engagement component aims to mobilise men in the communities to prevent violence at home. Group discussions with workers and management at a pilot factory in March 2017 found that workers and management felt that communication has improved. Male supervisors reported less stress and that they were trying to help more at home (however they also said they were reluctant to bring these issues up with friends or colleagues, for fear of being mocked). Female workers also said they have realised that they deserve to be respected at work and at home.

(v) Develop partnerships across and between stakeholders at different levels

Individually, businesses can be constrained in what they can achieve, particularly in terms of addressing deeply entrenched behaviours. **Partnership building across and between stakeholders at different levels** – local women's organisations, trade union federations, government institutions, donors, NGOs and standards systems – are critical to bringing about sustainable, transformational changes for women workers.

These groups can provide expertise on gender and support the development of organisational strategies. Local partners can investigate the linkages between gender inequalities in the workplace, household and community and advise on the most appropriate modes of engagement. Similarly, businesses can support civil society advocacy initiatives on gender equality, using their networks and access to political and government stakeholders.

(vi) Engage with and strengthen women's collective action and representation within the supplier company

To make any changes within supplier companies, it is important to ensure women employees are engaged in a meaningful way so that their views and needs can be heard and considered. This may mean strengthening women's roles and voice within unions, or, if unions are not active within the workplace, supporting women to begin organising and connecting to the trade union movement.

Review the supplier company's policies on collective bargaining for specifics on engagement with women representatives/trade unions and rights of women to participate in collective bargaining.

Identify ways in which women can be better represented and engaged in collective leadership and negotiations. In some contexts, it is recommended that women-only spaces are facilitated, such as women's committee within a mixed sex trade union, or a gender committee in the workplace, so that women can talk and discuss openly on the issues which affect them.

Guidance Box 9: Women's voice and capacity to participate

- Encourage women to participate in the union and encourage unions to conduct capacity strengthening and leadership activities with women workers so that they can participate meaningfully
- Ensure that women have the same contacts and opportunities as men so that they can be included in collective action and union representation
- Encourage the provision of childcare for union meetings, which could be out of working hours
- Engage with international trade union federations and national trade union congresses to identify how to strengthen the ability of sector specific trade unions to represent women
- Support women to set up a separate women's trade union to represent themselves, if there is no trade union or if the trade union excludes women, or where the trade union cannot represent them adequately.

(vii) Changing behaviours so that men and women benefit from positive working environments and practices

Supply chain companies should aim to develop their policies, guidelines and strategies through a **consultative process** which involves women and men workers, women's organisations and community actors, as well as collective bargaining with unions. Different forms of social dialogue and employee engagement can be effective in developing a culture that has greater understanding between men and women and where women have the space to speak openly without repercussions.

As behaviours within work environments are influenced by behaviours in the wider environment (e.g. workers' families and communities), broadening activities to include community engagement can help establish stronger ties and align with these changes. Local civil society organisations can play a key role in helping to influence behaviours and bridge gaps.

Be mindful of **the risks that gender equality initiatives may create in terms of backlash against women workers in the workplace and in their communities.** This is particularly the case when women workers become more visible and activist.

Case Study 7: Working with trade unions

In Tanzania, floriculture is an important industry, employing thousands of workers with women constituting up to 60 per cent. The sector has however been plagued with issues of harassment, intimidation, sexual and gender-based violence, poor wages, unsafe working conditions as well as discriminatory practices towards female workers. In response to this, the Tanzania Plantations and Agriculture Workers Union has supported several farms to educate women on their rights and raise awareness on key issues including discrimination and harassment by male supervisors. Through seminars and information sessions, the women have become more aware of their rights and developed the courage to report cases of gender-based violence. The union has also supported the establishment of Gender Committees that are tasked with dealing with problems that affect women on the farm. The committee includes male representatives who educate fellow men on workplace behaviour, including harassment and its consequences. It also has a system to follow up on cases, including relocating women to different farms whilst investigations are ongoing. For those who are scared to speak up, bystanders who witness an incident are encouraged to report to the committee or to management. These mechanisms have proved successful in creating an environment where women workers feel safe and respected.

(iv) Supporting women with unpaid care responsibilities

Women's domestic responsibilities have an impact on their ability to seek paid work, to be productive at work and to be able to move up the ladder. Companies and their suppliers can develop initiatives that support women with these responsibilities and ease double workload. Examples could include:

- Factoring women's unpaid contribution to production costs (see Case Study 8)
- Flexible working hours
- Childcare facilities in the workplace.

Case Study 8: Remunerating women's unpaid labour

In Nicaragua, an initiative supported by the Body Shop included women's unpaid contribution to sesame production in the costing of sesame oil it purchased from them. This was proposed by a sesame oil cooperative under its Community Trade (CT) programme. Under that programme, suppliers initially assess their own cost of production, which forms the basis for discussion and agreement of the supply price with the company. A 2006 costing review with the company coincided with a UK academic's visit to Nicaragua for research on women's unpaid labour. She suggested costing women's labour into the supply price and the cooperative agreed. She undertook a time-use study of a cooperative household and identified three types of work:

(i) direct support - which contributes directly to cash crop production (e.g. winnowing)

(ii) indirect support - which contributes indirectly to cash crop production (e.g. supplying food to farmers in field), and

(iii) home - which includes caring for children and elderly, and household activities (such as milking the cows, fetching water and fuel). These are activities that are seen as contributing to the stability of households and the community.

Women's 'support labour costs' were calculated at equivalent to 12 days per manzana (0.7 hectares) and valued at US$50 per annum (2006 figure). The company had to thoroughly consider the ongoing price implications and to secure internal buy-in, which ultimately resulted in an acceptance of factoring the unpaid labour into the cost price. This was aided by a sympathetic CT buyer and an increase in the world price of sesame oil. This calculation has so far continued to form the basis for compensating women's unpaid labour in the pricing of sesame oil.

5. Track and communicate

Gender equality policies should be accompanied by plans and strategies that include indicators for measuring progress. Regularly reporting on and communicating progress against ambitions for gender equality is a key way of celebrating success, highlighting ongoing challenges, maintaining momentum and signalling that the company takes it seriously. There are commonalities between the track and communicate approach for Pathway 1 and Pathway 2, so the approach is presented here as one, but with some nuance for the different pathways where appropriate.

(i) Build an understanding about what to measure. Management and leadership in the company and in the supply chain should develop performance indicators that:

- Reflect the business needs to report on progress towards gender equality and women's rights – both for the business values and culture requirements, and for external communication and compliance
- Reflect what women and men in the workforce think is important to them and their definitions of what success in terms of gender equality and women's rights means in their particular context. Where possible engage with workplace union.

Tackling gender inequality is a complex, long-term process which does not proceed in a linear fashion. As it is underpinned by deeply held beliefs amongst women and men about their roles, responsibilities and status, not all activities will have demonstrable and measurable impacts. In order to better reflect progress over the medium to long term it is useful to have an understanding of the change process, key milestones and expected results over the short, medium and longer-term. Both qualitative and quantitative indicators can be developed for each of the changes that are expected, so that companies can measure short term gain that they recognise is part of the process for moving towards medium term and long-term change. It is essential to collect qualitative data to understand and report on processes of empowerment and attitude change, as well as changes in power dynamics.

(ii) Indicator choices. Develop indicators which provide a balance between tracking activities and efforts and demonstrating changes in workers' workplace experience (see Annex 1). Adapt indicators to local contexts and ensure they are measuring the change that is envisaged in the company strategy on gender equality.

(iii) Monitoring methodologies and tools also need to be developed carefully and require female and male evaluators who are familiar with the organisation's policies and strategies and are experienced in conducting gender-sensitive research, using participatory approaches. Verifying data from suppliers will be a challenge. Evaluators can engage with local organisations to gain and triangulate their perspectives. In many contexts women should be interviewed by female researchers.

(iv) Using data and evidence to adapt approach and improve effectiveness. Ensuring that this monitoring information is engaged with (or collected at all) and used to make improvement depends on the existence of commitment and leadership from management. This includes buy-in from board-level and senior management, who may either act as, or support gender champions and committees. Efforts to include more women into management positions, and in decision-making positions and processes are also key if women's perspectives and needs are to be effectively integrated into business operations.

Case Study 9: Monitoring workforce representation initiatives

In 2014, due to changes in the Kenyan constitution and a desire for change from within, Finlays commissioned a review of its Kenyan operations in relation to gender. In January 2015, as part of 'Project Athena', the company committed to achieving a significant increase in the representation of women at all levels – the medium-term gender target was set at 33 per cent women, as stipulated in the Kenyan Bill of Rights, with a longer-term target of 50 per cent representation.

Finlays committed resources to take this agenda forward in their subsidiary company, and their first Gender Empowerment Manager was appointed. She reports to the HR Director Kenya and works closely with other executives in Kenya and the HR Director in the UK. Approximately 60 per cent of her time is spent working in the villages, schools and estates with training providers, committees, tea estate managers etc., with the other 40 per cent of her time spent collecting, monitoring and evaluating data.

The company has set in place targets for each broad level of employment; seasonal; ungraded; graded; junior management; and senior management - with progress measured by monthly monitoring and reporting of sex disaggregated data against a July 2014 baseline. By August 2017, the Flowers Department had reached 50 per cent gender parity at the 'ungraded' level. The tea estates were also able to increase the percentage of 'graded' female staff from 16 per cent to 21 per cent. They have achieved this through opening positions to external applicants and through the implementation of affirmative actions in recruitment.

Guidance Box 10: How to use data to build momentum

- Establish trust by communicating that buyers and suppliers are on a journey together in seeking gender equality and women's rights and that there will be an understanding of the complexity of progress. This means that monitoring is a learning exercise and should not punish stakeholders
- Feed data and learning back into stage 1 of the process, analysing and adapting the approach to enable more transformational change to take place
- Ensure that women's rights organisations and unions can verify and critically examine evidence so that it is widely understood and trusted
- Ensure all staff are kept up-to-date with changes that are taking place and the challenges that are being faced. This will help to support change in behaviour and attitudes around gender equality and women's rights
- Choose some positive case study stories about women's lives changing and publicise these widely so that they and the company can act as a role model for others
- Ensure that board and senior management lead the change process, understand how the changes can benefit their company and communicate this widely
- Produce a short film for digital distribution of the change over time and the benefits to the company and to the female and male workforce.

Annex 1. Sample monitoring indicators

Indicators and questions for measuring progress against the Women's Empowerment Principles can be found at http://weprinciples.org/Site/WepsGuidelines/

Levi Strauss Gender Metrics[5]

Focus Area	Metric (Disaggregate for men and women and by role)	
Business Operations	Productivity Performance Cycle time Overtime Absenteeism Tardiness	Profits Turnover (number leaving at all levels and why) Error rate (reject rate and redo rate) Well-being (perception of trust, respect and satisfaction at work) Clinic costs over time Number of clinic visits by reason
Skill Development	Job skills training offered Job skills training completed Percentage of workforce cross-trained	Percent of supervisors that are male or female Percent of workforce rotating jobs Promotion application rates Percent of total workforce that are male or female
Wages & Work hours	Average compensation Perception of wage equality Average hours worked	Percent of workers working more than they want to Percent of workers working fewer hours than they want to Percent of workers working overtime to obtain minimum wage or keep their job
Pregnancy & Parenthood	Number of pregnant workers Percent of women retained or lost after becoming pregnant Percent of women retained or lost after giving birth to a child Number of women workers interested in and actively breastfeeding Family planning counselling offered Health staff on site, qualified to provide reproductive and maternal health services	Number of workers referred to external productive and maternal health service Number of workers with children Number of children in school or day-care Perception of work-life balance Percent of eligible workers using the lactation room Educational materials and information on birth spacing and family planning methods made available Birth control made available
Menstruation	Perception of ability to adequately manage menstrual hygiene Number of women absent due to menstrual plain or menstruation-related issues	
Harassment	Number of logged complaints by gender and reason Percent of resolved complaints Average complaint resolution time	Number of men and women who have completed anti-harassment training Number of men and women concerned about harassment at the workplace Percent of supervisors with pay incentives aligned to workers

Endnotes

[1] https://www.tolerance.org/professional-development/test-yourself-for-hidden-bias

[2] ILO Convention No. 100 on Equal Remuneration, ILO Convention No.111 on Discrimination (Employment and Occupation), ILO Convention No. 156 on Workers with Family Responsibilities, ILO Convention No. 183 on Maternity Protection

[3] International Labour Office 'Social Dialogue' webpage. Last accessed July 3, 2018: www.ilo.org/ifpdial/areas-of-work/social-dialogue/lang--en/index.htm)%20%20a

[4] The new constitution, adopted in 2010, states that not more than two-thirds of the members of elective bodies can be of the same gender

[5] O'Connor, A. et al (2017), 'Improving Business Performance through Gender Equality: Strategies for the Apparel Supply Chain', Levi Strauss Foundation: http://levistrauss.com/wp-content/uploads/2015/03/IMPROVING-BUSINESS-PERFORMANCE-THROUGH-GENDER-EQUALITY_OCT-2017_FINAL.pdf/

Supported by

UKaid
from the British people

The Ethical Trading Initiative (ETI) is a leading alliance of companies, trade unions and NGOs that promotes respect for workers' rights around the globe. Our vision is a world where all workers are free from exploitation and discrimination, and enjoy conditions of freedom, security and equity.

Ethical Trading Initiative
8 Coldbath Square, London
EC1R 5HL
UK
+44 (0)20 7841 4350

eti@eti.org.uk
@ethicaltrade
ethicaltrade.org