

Gender Equality in Social Auditing Guidance

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About this Report

BSR's Gender Equality in Social Auditing Guidance outlines why and how gender considerations should be integrated into social auditing methodologies and processes.

It is designed to provide perspectives and recommendations on both how to best adapt existing auditing processes so that women's issues are better surfaced and how to explore alternative worker voice approaches to enhance or complement the process. The guidance draws on and is a follow-up to BSR's **Gender Equality in Codes of Conduct Guidance**, published in 2017.

Methodology

In addition to desktop research, gap analysis with current mainstream social auditing schemes, and insights gathered from more than 30 one-on-one interviews with social auditing firms, companies, multistakeholder supply chain initiatives, and social compliance experts, BSR conducted two consultation workshops in Hong Kong and in London in November 2017 to test assumptions and gather insights from social auditors and other stakeholders, including companies and assurance schemes.

Our research has also been informed by a survey targeted at social auditors. The survey gathered 132 responses (55 percent female/44 percent male/1 percent other), with most respondents in the 35–44 age bracket. Respondents reported conducting audits in a variety of regions (Asia and Africa being the first and second regions most commonly cited, with Latin American and Western countries following). The survey's objective was to assess:

- The existing audit check points that address gender most commonly found in social audit schemes
- Auditors' knowledge of gender-sensitive issues and the gender considerations cutting across codes of conduct principles such as wages, working hours, and employment relationships
- The skills necessary to best detect gendered issues, with a specific focus on worker interview skills
- The level and quality of training received by auditors
- The broader structural challenges linked to the industry and the improvements that auditors would like to see

Acknowledgments

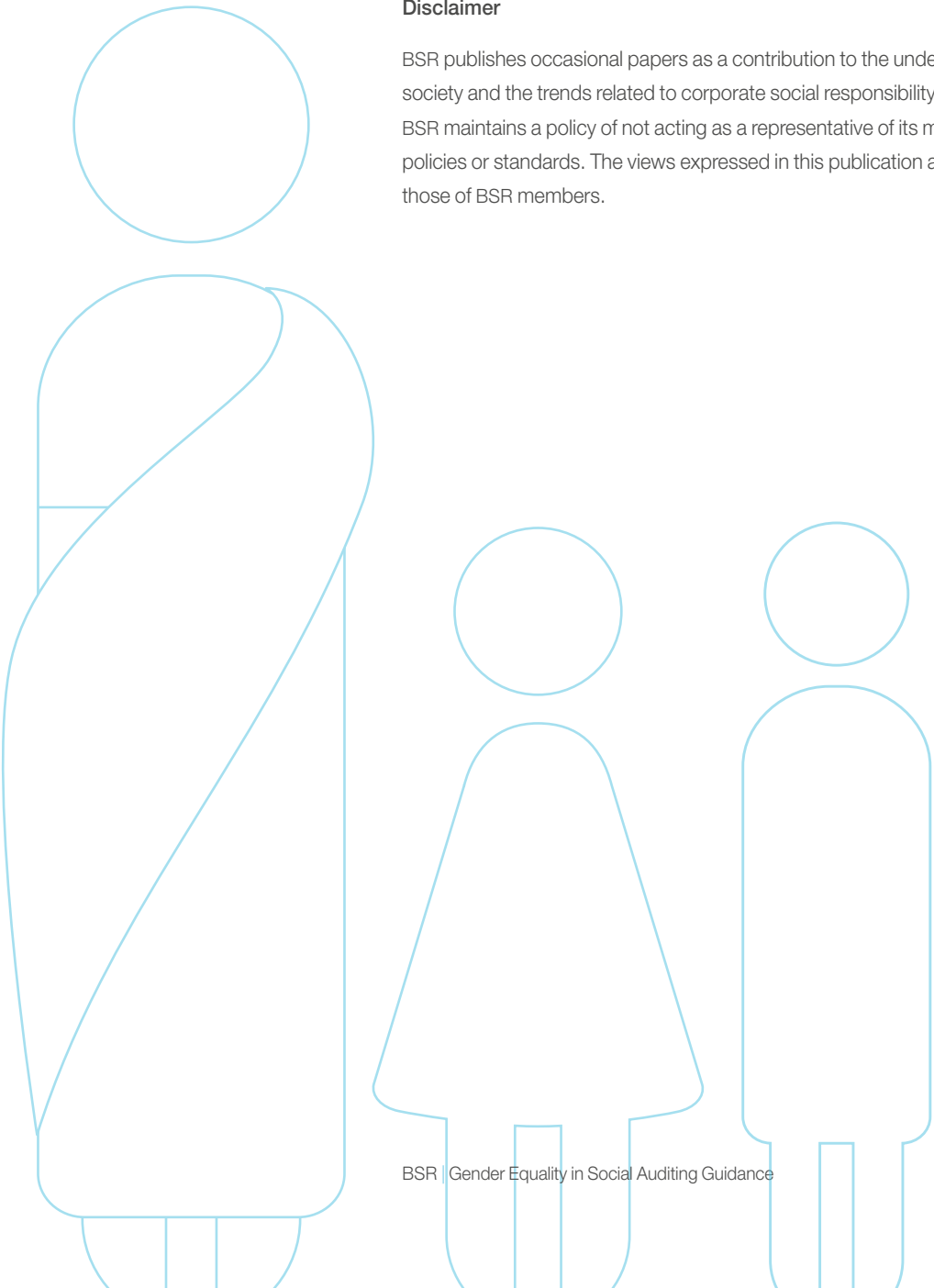
This Guidance was written by Magali Barraja with specific input from Margaux Yost and Jo Webb. Any errors that remain are those of the author. Please direct comments or questions to mbarraja@bsr.org

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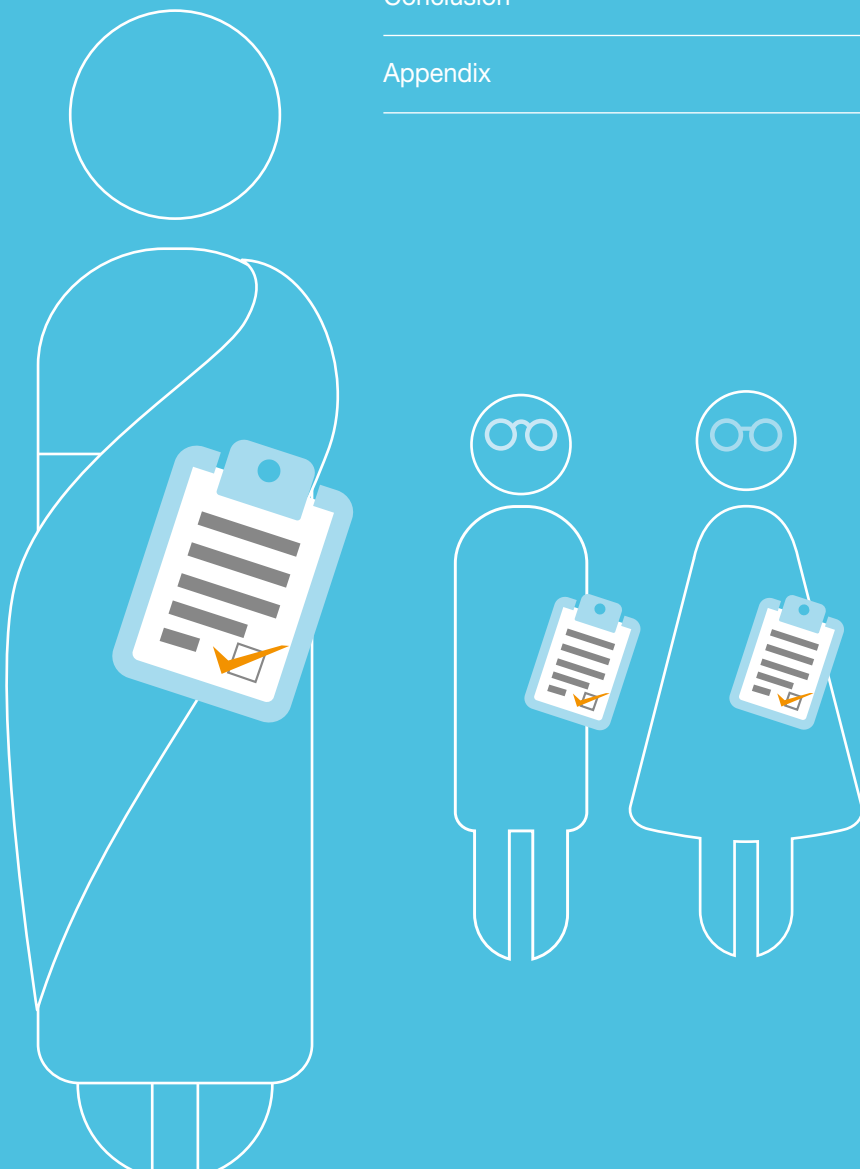
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Executive Summary

Today, most companies use social audits both to verify that suppliers are upholding the company's minimum requirements and to help design corrective action plans to improve workplaces. However, women's rights and workplace-specific challenges are often not reflected in supplier codes of conduct and are addressed in very limited ways, if at all, in the auditing methodologies used to verify compliance with such codes. This guidance is designed to address such absence by helping industry stakeholders make social audits more gender-sensitive.

The guidance:

- **Highlights the systemic barriers that prevent current social audits from being more gender-sensitive** and provides recommendations for overcoming such barriers
- **Explores how best to integrate gender considerations within existing auditing verification measures** and across the different principles addressed in supplier codes of conduct
- **Highlights the vital process of worker interviews** and considers how to maximise their effectiveness in picking up gender-sensitive issues
- **Explores methodologies such as worker engagement approaches that are not traditionally related to social auditing** but that may enhance the ability of companies to identify gendered issues and effectively design remediation plans to improve workplace conditions for women
- **Explores the broader range of strategies that companies should consider for monitoring their suppliers** and assesses whether such strategies may complement or partly replace social audits

This guidance serves two main purposes. First, it helps auditing companies and social auditors identify and support the implementation of the changes required to make social audits more gender sensitive. Secondly, it provides recommendations for companies and for organisations active in the broader supply chain ecosystem to transform the systems that govern social auditing requirements, thereby ensuring that gender considerations are fully and sustainably integrated into social auditing processes.

Introduction

What is Social Auditing?

¹ www.ids.ac.uk/publication/participatory-social-auditing-a-practical-guide-to-developing-a-gender-sensitive-approach

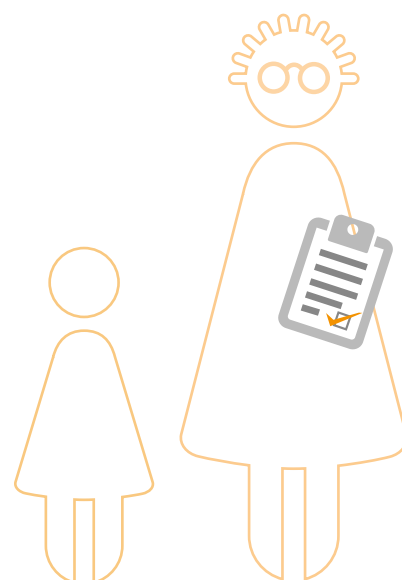
² cleanclothes.org/resources/publications/05-quick-fix.pdf/view

Social auditing has been prevalent since companies first established codes of conduct in the 1990s. A social audit is based on the code of conduct of a company or an independent organisation; its primary objective is to assess a business partner's performance against the expectations and requirements set out in the code.

Social auditing is often seen as advantageous as it can provide companies with a relatively quick (depending on the size of the facility) and quantifiable (through relying on document checks) way of verifying code of conduct clauses, mirroring the methodology of financial audits. Social audits respond to the perceived need for visibility and control and are considered an effective way of minimizing the risk of opportunistic behaviour. They are also considered an appropriate response to increased stakeholder pressure for accountability regarding the working conditions in a company's supply chain.

Social audits in supply chains have evolved and their use has diversified over the past decades. Social audits are conducted in different contexts: They can be voluntary in the context of certification schemes, but in most cases companies direct suppliers to undertake a social audit. Companies use social auditing at different stages of the commercial relationship and for different purposes. Some use a pass/fail approach at the start of a commercial relationship as a condition for conducting business with suppliers. Some use them as a diagnostic tool to underpin remediation plans. Some use them only to check progress once actions to improve working conditions have been carried out. Some use them at all these different stages. Different approaches to social auditing exist with varying degrees of investigation, root cause and outcome analysis, and involvement of workers, ranging from a straightforward tick-box exercise to participatory approaches with workers at the centre.¹

That said, social auditing is more often considered to be a narrow "snapshot" exercise, focusing largely on surfacing issues linked to workers' employment relationship through documentation checks. As such, the social audit often lacks the ability to uncover more complex, less visible social issues related to (for instance) freedom of association, discrimination, and sexual harassment. The siloed focus of social auditing is also often perceived as a concern, as the verification and non-correlation of separate factors makes it difficult to analyse root cause and interlinkages between issues—which is particularly important when considering gender-sensitive issues.²



Definition | (Social) Audit

The thorough formal examination of the labour practices of a particular workplace or company, based on corroborated evidence. The audit aims to check these practices against a defined standard, such as a code of labour practice.

A social audit can take different forms and be conducted by various bodies:

- **First Party:** where a (supplier/subcontractor) company undertakes an assessment of itself; this is also referred to as 'self-assessment'.
- **Second Party:** where a company audits one of its suppliers (or an agent/supplier audits one of its suppliers); in the former case, this is also referred to as an 'in-house' audit.
- **Third Party:** where a company is audited by an external body. Fees may be covered by the buyer or the supplier being audited (commonly the latter).
- **Multi-stakeholder:** where monitoring is undertaken by a mixed group, commonly composed of buyer representatives or commercial auditors, local and/or global trade unions, and civil society representatives, with the aim of producing a fuller and more accurate picture of labour practices within a facility.

Source: <http://www.bibalex.org/Search4Dev/files/431941/460338.pdf>

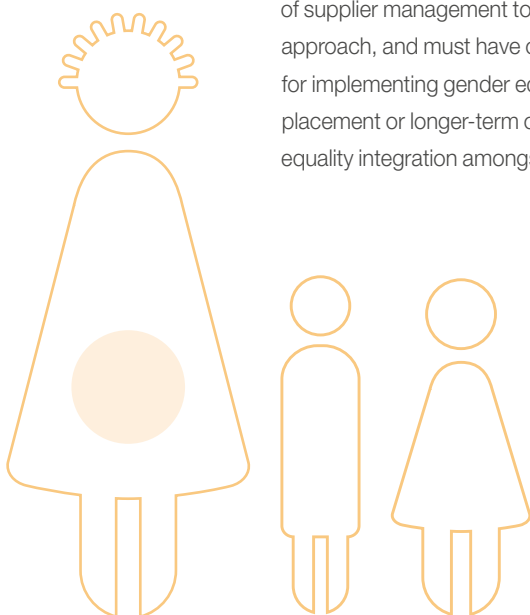


Other commonly recognized weaknesses of social auditing include:

- Falsification of records and double record keeping, which has emerged as a major concern in the past decade
- The coaching of workers to convey incomplete or false information, which has been reported as a common practice
- Announced audits (the most common practice), which increase the likelihood of suppliers being able to cover up flaws and convey a good image of their facility. While unannounced audits may risk incomplete information and an absence of supplier management, they are viewed as better able to capture a true picture of the supplier and of workers' voices. However, this practice also risks jeopardizing the relationship with suppliers, as unannounced audits are based on control rather than trust. The approach that is traditionally preferred is to have an initial announced audit and to follow up with unannounced audits.
- Limited time allocation to social auditing, as it can be costly and can disrupt factories' day-to-day management. This has an impact on the size of sampling of documents and the time allocated to worker interviews.
- Disparities in the competence and knowledge of auditors, which has an impact on the effectiveness and findings of social audits

In an attempt to provide a level playing field for their members while ensuring a credible assurance scheme, a variety of multi-stakeholder initiatives (MSIs) and organisations such as Fair Wear Foundation (FWF), Better Work, and Social Accountability International (SAI), as well as industry-led platforms such as the Business Social Compliance Initiative (Amfori/BSCI), Sedex (through SMETA), and the Global Social Compliance Programme (GSCP), have since the late 1990s developed auditing guidelines and requirements aligned with their codes of practice. These guidelines define auditing procedures, including audit length and time spent on worker interviews.

The requirements of companies and of various business-led, multistakeholder initiatives are more likely to become embedded within supplier factories where there is a genuine commitment to upholding good labour practices. This is even more the case with a topic such as gender equality, which requires a long-term, integrated approach. To facilitate this commitment, companies must build the capacity of supplier management to track and analyse the business benefits of adopting a more gender-equal approach, and must have open conversations about the cost implications of these changes. Incentives for implementing gender equality measures, including business incentives through preferential order placement or longer-term commercial agreements, should be used to promote and encourage gender equality integration amongst suppliers.



Why Gender-Sensitive Social Auditing?

³ www.bsr.org/en/our-insights/blog-view/business-must-close-the-gender-gap


The resilience of global supply chains is intrinsically linked to the status of women on farms and in factories. In many industries, including agriculture, healthcare, apparel, and toys, women make up a majority of the workers.³

⁴ hbr.org/2013/05/the-other-womens-movement-fact

When women's health, well-being, and access to opportunities are compromised, their productivity and efficiency suffers, which in turn hurts companies. Ignoring gender gaps and inequalities can leave companies exposed to production and delivery disruptions, bottlenecks, and inefficiencies.⁴

Gendered issues are not only relevant when considering how best to empower women workers in the supply chain; they are equally relevant when considering more holistic approaches to improving supply chain working conditions and relationships.

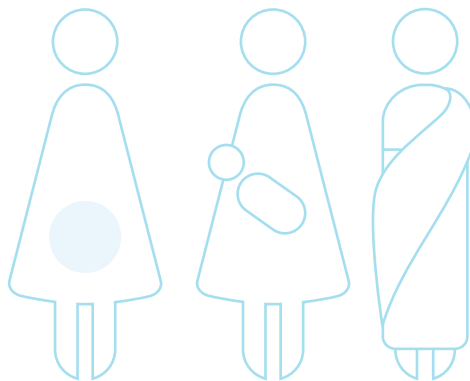
Social auditing is currently used as a baseline to draw up remediation plans and drive improvements in most factories and farms around the world. Mainstreaming gender equality considerations within social audits would have beneficial effects on the ability of companies and suppliers to identify and adequately remediate material existing issues for the women in their supply chains. Companies should therefore consider the actions and opportunities on the following page.



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Actions and Opportunities for Companies

- **Putting a gender lens on due diligence:** The UN Guiding Principles on Business and Human Rights are likely to shortly feature additional guidelines on gender.⁵ Companies that are collecting better and more systematic information on women's needs and issues in the supply chain will ensure better alignment with the Guiding Principles. Beyond this, and given the prevalence of women in the supply chain workforce, companies must understand the issues women face in the supply chain to manage risk and ensure long-term supply chain resilience.
- **Raising suppliers' awareness on the importance of gender equality:** Social auditors performing more consistent and systematic gender checks will raise awareness among suppliers of gendered issues and in the long term will contribute to integrating these considerations into "business as usual" requirements. Integrating these considerations into corporate tools such as codes of conduct, self-assessment questionnaires (SAQ), and auditing verifications will send strong signals to the market, highlighting that gender equality is no longer an add-on topic but is essential to achieving decent working conditions for all.
- **Calling for better gender-disaggregated data collection and more transparency:** Data on women in supply chains is scarce, which prevents women's and men's issues from being fully identified and adequately addressed. Part of the solution is to make women and their needs more visible so that issues can be uncovered, measured, managed, and monitored. This requires better data collection, such that for any activity, program, or operation, a supplier will be able to track the level of participation of women and men workers. Good gender-disaggregated data collection is fundamental to transparency and crucial in driving meaningful change in global supply chains.
- **Driving change by supporting suppliers to undertake better informed root cause analysis on trends affecting their own bottom line:** Assessing suppliers' performance on gender equality, including through specific data and record checks during the audit, will underline to suppliers the importance of collecting gender-disaggregated data on their own workforce. With the right level of support, this will enhance the ability of suppliers to analyse the root causes of any existing gendered absenteeism, turnover, and other key indicators potentially affecting their bottom line, and will help suppliers assess how best to respond.



However, mainstreaming gender equality considerations within social auditing has its challenges:

- Codes of conduct, which social audits are designed to assess compliance against, are traditionally gender neutral. Gender considerations, and in particular women's rights, are often addressed in very limited ways, if at all, in codes of conduct. The two principles that have a direct recognized link with women are non-discrimination and harassment (sexual harassment being a sub-category of harassment). Even when they integrate international conventions relating to the aforementioned topics, codes of conduct and the associated auditing questionnaires do not apply a gender lens to the breadth of issues (e.g. wages, working hours, regular employment) that disproportionately affect women workers. Covering such issues would help suppliers to pinpoint the areas where action is needed to drive gender equality in factories and farms.
- When viewed from within a narrow compliance approach, social issues—and to an even greater extent, gendered issues such as discrimination and sexual harassment—are difficult to identify. This undermines the effectiveness of social auditing. Often, because the issues are not visible or because evidence is thin or not corroborated, the issues are not recorded or reported. A recent analysis conducted by BSR of one of the main ethical audit databases uncovered that out of the 235,000 non-compliances identified within 87,000 audit reports (between 2014 and 2017), only 935 gender-specific non-compliances were reported (0.4 percent of total non-compliances). The top three most common gender-specific non-compliance categories were related to issues easily identifiable by auditors, either visually during site observation, such as the lack of gender-segregated washrooms and toilet facilities (46 percent); or through document checks, such as the absence of policies on discrimination (19 percent) and sexual harassment (13 percent). Non-compliances related to discrimination against pregnant women (three percent) and sexual harassment (two percent) were less commonly identified and reported.

Gender-related Non-compliances	Percentage
Access to jobs for women	5%
Pregnancy	3%
Lack of communication of non-discrimination policy	2%
Lack of policy on sexual harassment	13%
Opportunities for women	10%
Sexual harassment	2%
Washroom and toilet facilities	46%
Lack of non-discrimination policy	19%

Social auditing has subsisted as a practice for more than two decades now and companies still heavily rely on these checks as part of their due diligence processes, including to inform the baseline for improving working conditions for their workers. As an integral part of companies' supply chain management tools, it is important to take a closer look at how the current social auditing methodologies can be enhanced to better identify issues pertaining to women in the workplace.



Meeting
Production Targets



Maintaining
a Strong and
Stable Workforce



Increasing
Productivity
and Cost Savings



Compliance



Worker
Engagement

Why Addressing Gender Equality Issues in Global Supply Chains Makes Business Sense*

Meeting Production Targets Productivity increases when women are healthy and given equal opportunity to advance in the workplace. At a factory in India, productivity was 15 percent higher for women who underwent life and technical skills training under Gap's P.A.C.E. programme. In Cambodian factories, improvements in working conditions decreased in-line product rejections by 39 percent and shipment rejections by 44 percent. BSR's HERproject found a 22 percent decrease in the number of products requiring rework across 37 factories in six countries after women's empowerment programs.

Maintaining a Strong and Stable Workforce When women have the skills and knowledge they need to lead healthy and productive lives inside and outside of the workplace, they are less likely to leave their jobs. BSR's HERproject found a 4.5 percent decrease in turnover across 37 factories in six countries following women's empowerment programmes. NCS (a camp management and catering company in Papua New Guinea) saw a 100 percent retention rate for women one year following their return from maternity leave after implementing gender-sensitive policies.

Increasing Productivity and Cost Savings By developing gender-specific training for ECOM staff and local suppliers on coffee plantations, IFC was able to increase the productivity of coffee farmers: Productivity increased 36 percent more for groups which trained both men and women (versus training only men). In one factory, BSR's HERhealth programme found that investing in the health of low-income women can deliver a four-to-one return on investment due to the cost savings associated with reduced absenteeism and staff turnover.

Compliance Women are more likely than men to comply with health and safety requirements and other norms. Several studies show that women are better at following safety, legal, and ethical compliance standards than men. One HERproject participating company found a reduction in the number of compliance-related non-conformances among suppliers that participated in the programme.

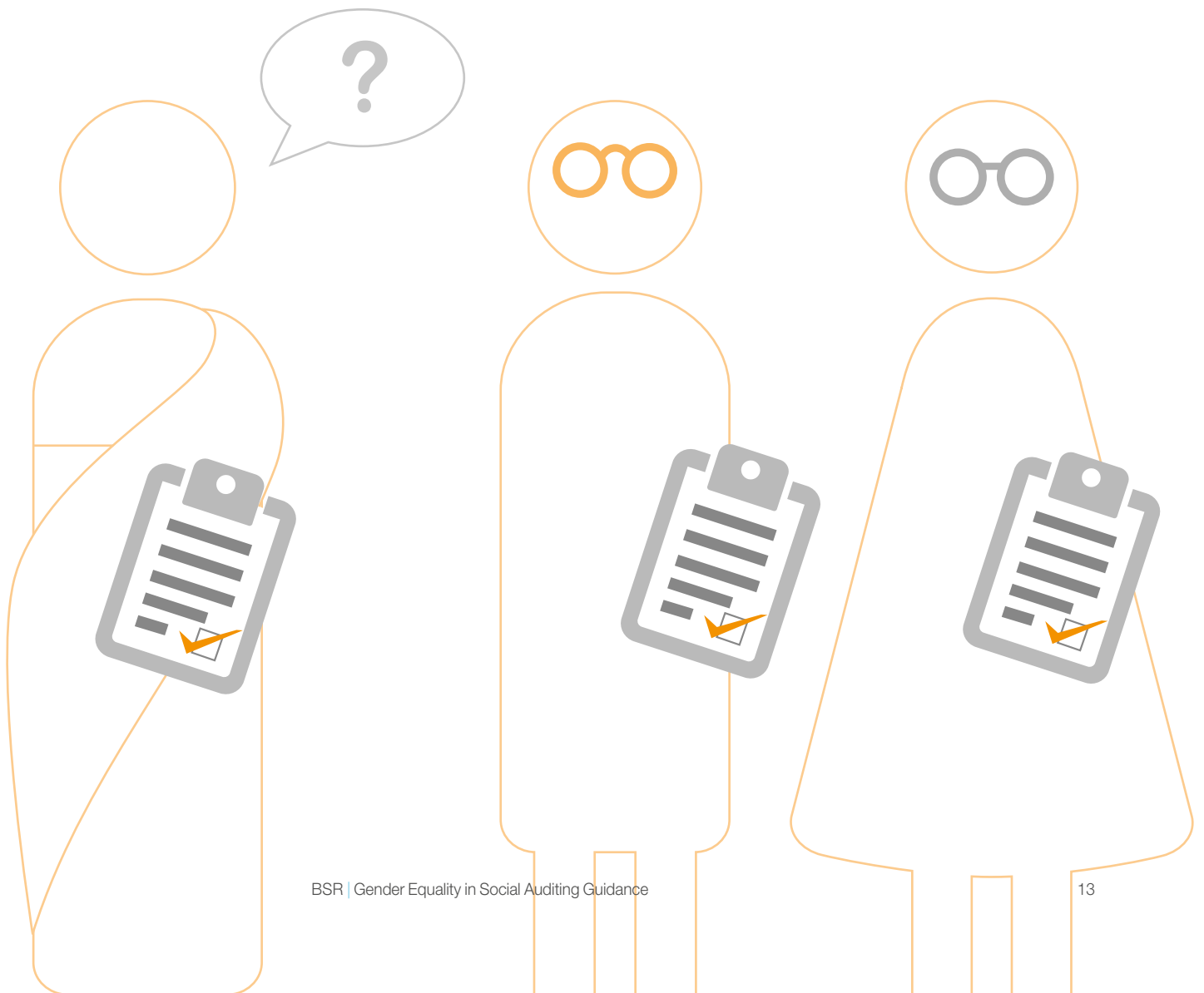
Worker Engagement Women in leadership positions inspire other women. By promoting women in the workplace, companies can motivate other women to work harder because they can see their potential career trajectory. According to the 2014 Global Workforce Study, empowerment—specifically, involvement in decisions concerning them—is a crucial global driver of engagement for women leaders.

* Examples on this page are taken from the following sources:
<https://www.ifc.org/wps/wcm/connect/dc30bd0e-392a-4d05-b536-81e3afdd1a25/Investing+in+Women+April+2017A.pdf?MOD=AJPERES>
<https://betterwork.org/blog/portfolio/impact-assessment/>
https://www.icrw.org/wp-content/uploads/2016/10/PACE_Report_PRINT_singles_lo.pdf
<https://herproject.org/impact>

How to Use this Guidance

This guidance has been developed with several objectives in mind, notably to provide:

- **Auditing companies and social auditors** (whether second or third party) performing social audits in global value chains with specific gender-sensitive verification measures and key techniques that can be integrated into an audit.
- **Companies** (using their own social auditing teams or using third party providers) with a better understanding of the challenges faced and with guidance on influencing the broader ecosystem to make audits more gender-sensitive, including considering other methodologies to complement or replace social audits.
- **The broader spectrum of social compliance regulatory organisations**— including standard holders, certification schemes, supply chain initiatives, and auditors' associations— with a clear picture of the needs for the industry if social audits are to become better at picking up on gendered issues and identifying their root causes.



Section Objectives

Section 1 Social Auditing: Key Perspectives and Recommendations

page 17

Objective: Help you to **understand and address the structural constraints** that prevent social audits from being more gender sensitive.

Section 2 Integrating Gender-Sensitive Audit Verification Measures within Existing Audit Assessments

page 35

Objective: Help you to **integrate specific gender-sensitive verification measures** across all codes of conduct principles. This will be done through the lens of the recommendations provided in the **Gender Equality in Codes of Conduct Guidance**

Section 3 Focus on Interviews: Towards More Gender-Sensitive Worker Interviewing Techniques

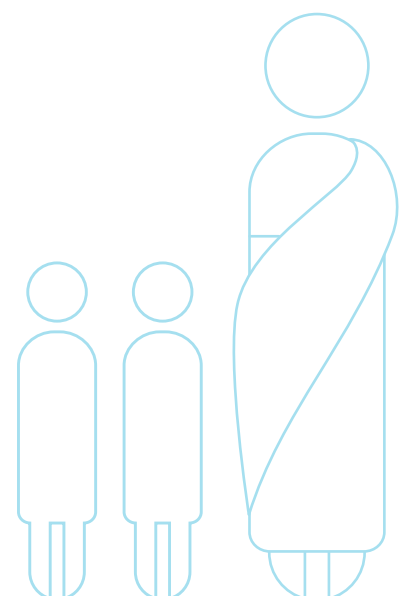
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Objective: Help you to **understand the particularities of interviewing workers and to apply gender-sensitive worker interviewing techniques.**

Section 4 From Risk Management to Impact Measurement: Putting Worker Engagement at the Heart of Change

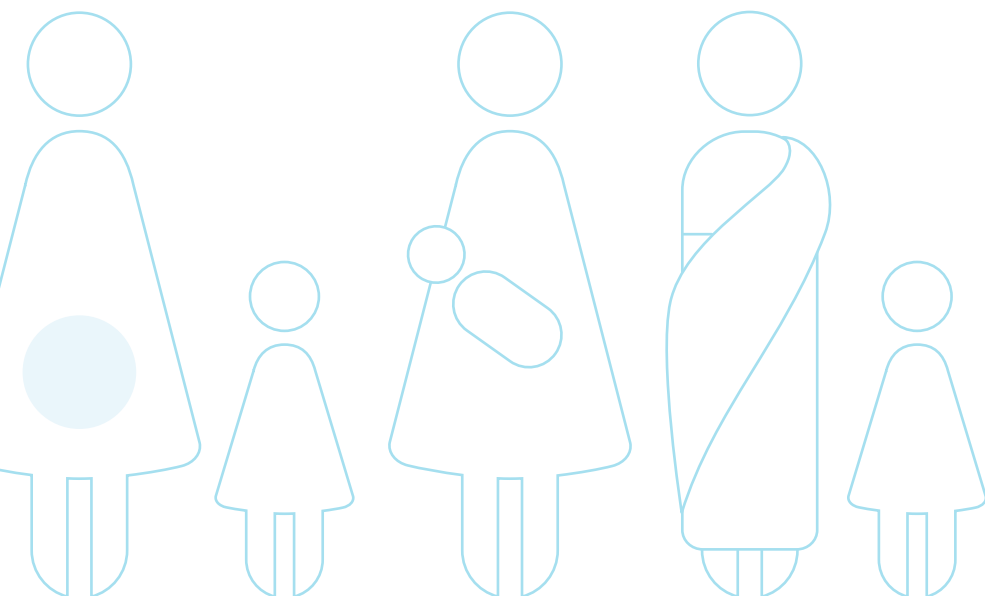
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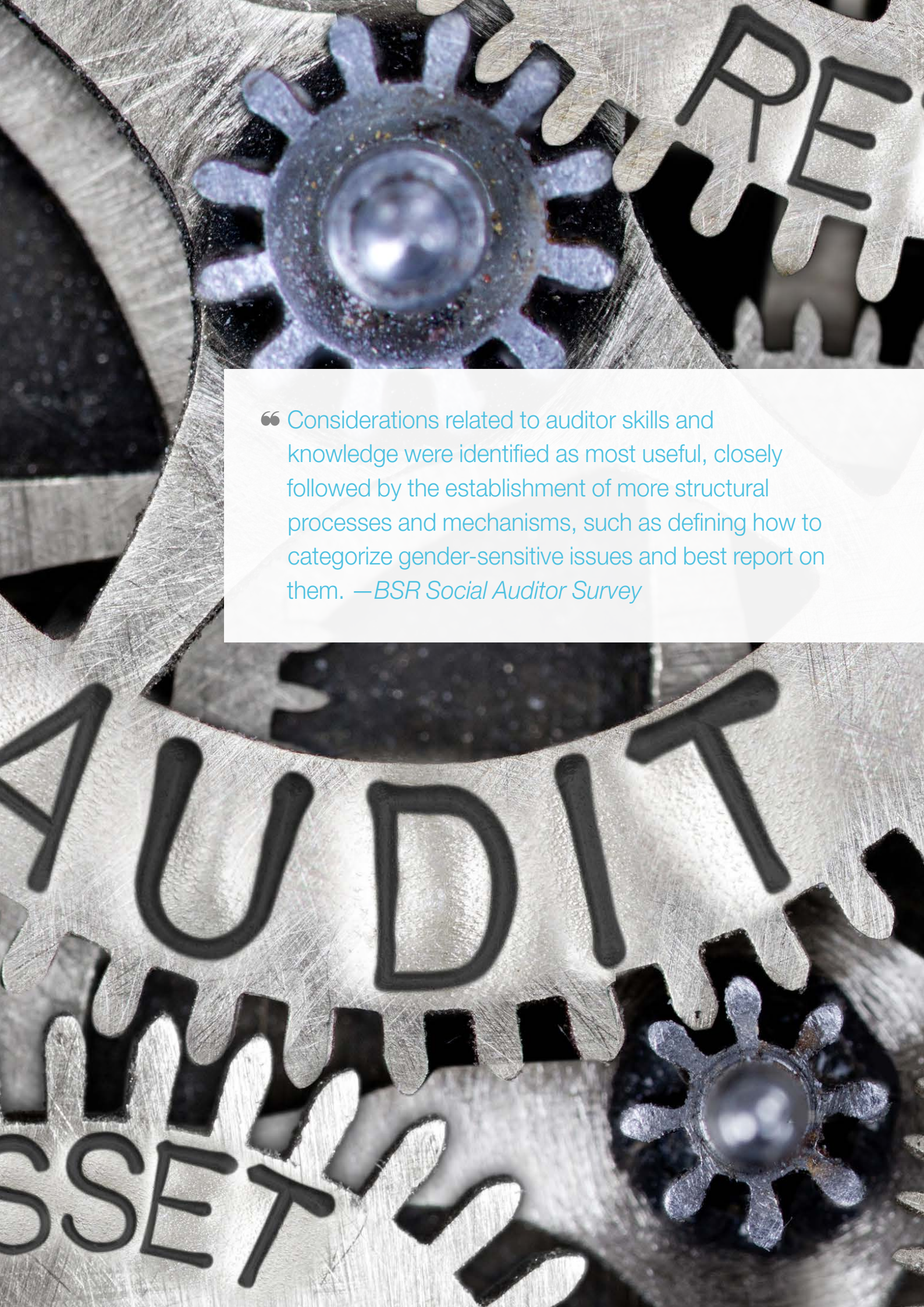
Objective: Help you to **more effectively gather insights on worker issues and needs** through methodologies and techniques that are currently not part of traditional social auditing. The section also provides some perspectives on approaches that could be integrated during the conduct of an audit or complement the existing auditing process.



The graphic below will help you navigate the more detailed content of the guidance based on the structural elements of a social audit:

Social Auditing Phases and Relevant Guidance Content





“ Considerations related to auditor skills and knowledge were identified as most useful, closely followed by the establishment of more structural processes and mechanisms, such as defining how to categorize gender-sensitive issues and best report on them. —*BSR Social Auditor Survey*”

Section 1 Social Auditing: Key Perspectives and Recommendations



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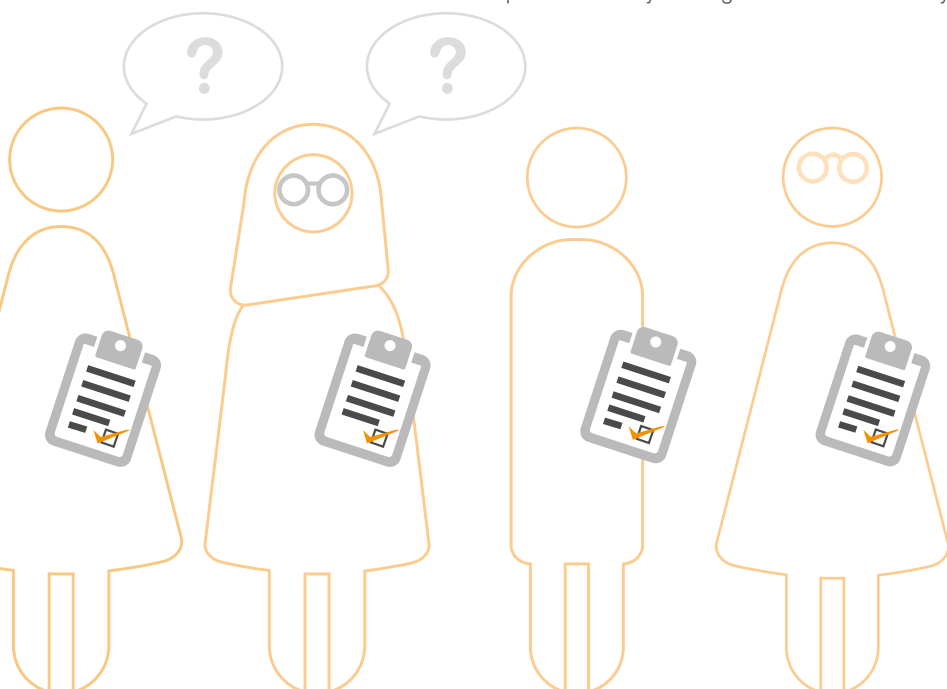
Beyond enhancing the gender sensitivity of the audit questionnaire itself, it is important to consider some key improvements at the input, design, and output stage to make audits truly more gender sensitive.

Auditors who completed the BSR survey rated the usefulness of certain techniques or processes for better detecting and reporting gender-sensitive issues.

The results are shown below:

	Very useful	Useful	Somewhat useful	Not useful
Training on local gender-specific issues	35%	41%	16%	8%
Worker interview skills	46%	39%	9%	6%
Collection of gender-disaggregated data	15%	53%	20%	12%
Wider social root cause analysis	23%	47%	18%	12%
Effective non-compliance categorization	15%	54%	18%	13%
Mechanism for reporting on gender-sensitive issues	25%	46%	18%	11%

Considerations related to auditor skills and knowledge (training on local gender-specific issues and mastering worker interview skills) were identified as most useful, closely followed by the establishment of more structural processes and mechanisms, such as defining how to categorize gender-sensitive issues and best report on them. This first section provides some perspectives on these considerations and on broader structural constraints within the social auditing process, which may directly or indirectly prevent gendered issues from rising to the surface. This section also offers some recommended first steps for effectively tackling some of these more systemic issues.



Composition of Audit Team

Research on more than 17,000 code of conduct audits conducted at nearly 6,000 suppliers around the world has shown that the gender of audit teams has a direct impact on general audit findings.⁶ Several gender-based distinctions seem to affect not only whether social auditors detect issues but whether these are reported as violations.

⁶ www.hbs.edu/faculty/Publication%20Files/ShortToffelHugill2016SMJ_4746e9b3-c482-4d09-b5aa-f2861fd1010f.pdf

⁷ This will, however, have its limitations in practice, as small supplier sites will not necessarily warrant a two-person audit team (based on size of facility and costs of additional auditor), and as a disproportionately larger audit team may cause disruptions that are counterproductive to effective information-gathering.

⁸ www.hbs.edu/faculty/Publication%20Files/ShortToffelHugill2016SMJ_4746e9b3-c482-4d09-b5aa-f2861fd1010f.pdf, page 1883

Women auditors have been shown to be more persistent at pursuing assigned tasks and more comprehensive in gathering and processing information, more fully assimilating available cues that might allow them to perceive violations in a complex factory or farm setting. Furthermore, evidence also suggests that women are more likely to “go by the book” and report identified violations more systematically. However, research also shows that a gender-diverse audit team will yield as many total violations as all-female teams. In a nutshell, gender-diverse or all-female teams have proven to be more effective at identifying violations overall during social audits. This establishes a strong link between gender and the quality of audits and reinforces the business case for gender-diverse audit teams.⁷

When thinking about audit team composition, two perspectives are equally relevant to the improved surfacing of gender-sensitive issues within social audits:

- The perspective of the information seeker (the social auditor)
- The perspective of the information provider (the worker).

For the identification of gender-specific issues, the gender of the auditor may be of crucial importance. First, female social auditors may demonstrate enhanced ability in interpreting “emotional content of others’ expressions” and reacting to more “subtle stimuli,” which is an advantage and a valued skill when interviewing workers, especially on sensitive topics that relate to gender norms and behaviours.⁸ Secondly, the gender of the social auditor may also have an impact on the openness of the information provider (farm and factory workers, and more specifically, women workers). BSR’s auditor survey has revealed that in general, female workers are more likely to communicate and share information openly with female auditors. However, this statement must be qualified. Insights from BSR’s work in India suggest that in poorer, more rural regions/provinces, women workers may find it easier to open up to male auditors, whom they consider as having more authority than women and therefore as better being placed to influence effective change following a grievance. In addition, as some gender-sensitive issues such as sexual harassment carry a heavy social stigma, intra-gender openness may be discouraged, making for less effective disclosure.

There may also be practical barriers to securing a female auditor for every social audit carried out around the world. Men represent a majority in the social auditing industry, in particular in developing countries. For instance, certification bodies (CBs) in West Africa have reported having a limited number of women social auditors, with as little as one quarter of women auditors in the Ivory Coast.

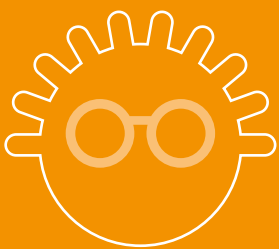
Logistical considerations and other important variables such as language skills, industry-specific expertise, and availability are also defining criteria when looking at the composition of teams. Safety of women auditors may also be a factor. Nonetheless, gender diversity should be more systematically included as a consideration.

Companies (as the clients) and certification schemes (as the regulators for a specific segment or industry) can and should influence audit team composition. Greater consideration should be given to gender diversity, both to improve the overall audit quality and to increase the likelihood of gendered issues being identified more systematically. Some certification schemes such as the Sustainable Agriculture Network (SAN), which runs an accreditation program for CBs that certifies farmers against the RainForest Alliance seal, do require that “at minimum one female auditor” should be part of audit teams of SAN-authorized CBs.

Recommendations

- **For Companies:** Clear requirements and guidance should be provided to companies with regards to gender-balanced audit team composition for their audits. This is even more relevant when gender-sensitive topics are the focus of the audit (for instance, in the case of follow-up audits on suspected gender-specific violations). Suppliers who commission their audits directly should also be required to use gender-balanced audit teams.
- **For Auditors' Business Associations and Auditing Companies:** Partnerships with training institutions should be created to enhance the attractiveness of the social auditing industry to women applicants. In addition, targeted recruitment efforts should be encouraged to enhance the overall presence of women in the social auditing industry.

In the medium term, these combined efforts should heighten auditing firms' attention to the importance of gender balance in auditing teams. In the longer term, such efforts should also support the penetration of more women into what is currently a male-dominated industry by creating the need for more gender-diverse auditing teams.



Competence and Knowledge of Auditors

¹⁰ www.ipai.pt/fotos/gca/social_auditor_standards_final_1271013426.pdf

Uncovering issues deeply anchored in cultural and gender norms requires a nuanced and thorough understanding of the power structures and dynamics within which factories and workers operate.

When auditors were asked in BSR's survey how informed they felt they were about gender-related issues (including country specificities), 43 percent answered that they were not informed or not well informed and only 58 percent reported that they had received training on how to audit and look for gender-sensitive issues.

*The Standards for the Knowledge and Skills of Social Auditors*¹⁰, which were designed to provide guidance to social auditing training institutions and which outline the foundational skills and knowledge for performing a social audit, highlight the cross-cutting nature of gendered issues and the importance of the auditor's sensitivity with regards to the topic, including the examination of his or her own attitude towards it.

While these knowledge and skills are qualified as "essential" within the scope of this standard, they are often overlooked in reality. Our survey has revealed that "auditors are expected to learn by doing" and that very little systematic auditor gender training is conducted. It has also been reported that regular information is not provided to auditors on gender-specific local issues. In fact, almost 70 percent of auditors report that having pre-audit risk profiling information on gender available at macro (country and industry) and micro (facility) level would considerably improve their ability to detect gendered issues during audits.

The Standards for the Knowledge and Skills of Social Auditors

Essential Auditing Knowledge (related to gender)

- 1.2.5 National/regional employment laws, standards, and regulation including on gender issues, parental leave, gender-related work accommodations and benefits, and childcare.
- 1.3 National/regional labour laws on discrimination and harassment and abuse, including gender-based abuse and sexual harassment.
- 3.3.1 Social-cultural and gender differences in compliance approaches.
- 3.3.3 Gender-related issues such as requiring proof of non-pregnancy, standing requirements, rest periods, and work termination due to pregnancy.
- 3.6.3 Practical application of social, cultural, and gender dynamics of worker communities in the conduct of an audit.

Source: http://www.ipai.pt/fotos/gca/social_auditor_standards_final_1271013426.pdf

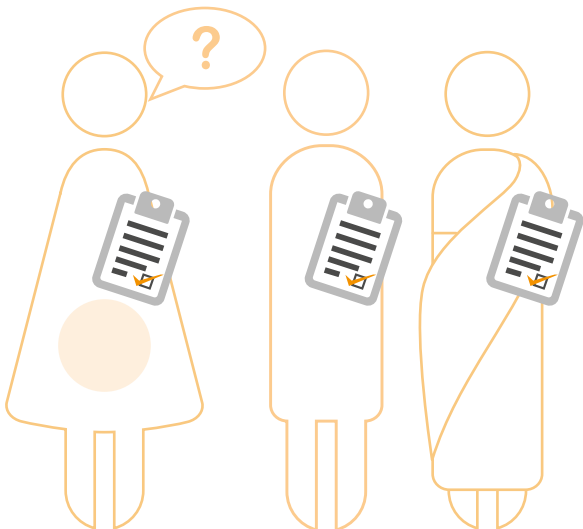


Training for Better Work's Enterprise Advisors

Sexual Harassment prevention training: Better Work has provided training on sexual harassment prevention for enterprise advisors in Bangladesh, Haiti, Lesotho, and Nicaragua. In each of these countries, the foundation of the training has been to create the space for reflection upon the meaning of sexual harassment in the world of work, drawing upon the examples that staff know about from their work in factories, as well as from within their community and country context. This awareness raising work has made use of drawing exercises and videos to provoke discussion and to introduce the formal definition of sexual harassment as it relates to ILO Conventions on Discrimination in the workplace. The second half of the training for enterprise advisors has involved the development of worker interview skills focused on the assessment work, followed by advisory work that incorporates real factory situations with the introduction of the Sexual Harassment Prevention toolkit.

Following the training, many of the enterprise advisors have reported a greater awareness of sexual harassment and the importance of self-reflection in relation to their own behaviour. Enterprise advisors in many countries have also made significant effort to include the subject in their interviews with workers, using indirect approaches to build the trust of workers to discuss the issue.

Employment Discrimination training: Better Work also conducted internal training for its enterprise advisers on the ILO Convention concerning Discrimination in Respect of Employment and Occupation (ILO C111), sensitizing enterprise advisers on this issue. In Vietnam, it is common practice for factories to provide bonuses to workers, such as attendance bonuses, daily production bonuses, and annual bonuses. It is often the case that time away from work for maternity leave, paternity leave, prenatal leave, and nursing breaks is excluded when calculating these bonuses and entitlements. While this practice is likely not intended to be discriminatory, it disproportionately affects workers based on their sex, and can contribute to a gender wage gap. Enterprise advisors have started to raise awareness on this issue and are discussing steps to address it with factories.



In addition to gender-related knowledge, detection and analytical skills are a must when it comes to uncovering gendered issues that may not be easily visible. Probing and further investigation may be required to determine the interconnectedness of these issues with other seemingly unrelated non-compliances.



Case Study

Interconnectedness of Workplace Issues

In a garment factory in Bangladesh, auditors conducting health and safety inspections identified two different fire escape doors (one official door used by men and one unofficial door used by women). Through worker interviews, auditors discovered that women reported not wanting to use the same emergency exit as men as the men had groped their breasts during previous fire drills. The women preferred to use the unofficial exit, which fell short of all health and safety standards, to avoid sexual harassment.

Source: Presentation by Jane Pillinger: “Why Gender Matters! International Labour Standards, Collective Bargaining and Gender Equality”

When no other stakeholder (e.g. trade union or NGO) is involved in the auditing process, it is the sole responsibility of the auditor to identify and understand the nuances and complexities behind a broad range of issues, including gendered issues. The auditor’s competence and knowledge are therefore a crucial factor for the performance of effective social audits, to the extent that some companies have narrowed not only the pool of auditing companies allowed to perform their audits but the pool of individual auditors that they trust to conduct effective audits. This exemplifies the importance of the auditor’s competence and knowledge for the credibility of the audit findings. It also indirectly underscores the disparity in auditing companies’ approaches to competence and knowledge management of their staff, despite the specific requirements of voluntary initiatives and certification schemes.

In addition, and as mentioned above, the BSR survey results have confirmed the need for a focused intervention on competence and knowledge management if social audits are to become more gender sensitive. Several umbrella organisations are regulating these requirements for auditors, including how auditing companies’ management systems should account for their auditors’ competence and knowledge management.

¹¹ www.accreditation-services.com/about/asi

¹² www.theapsca.org/certification-pilot.html

¹³ www.rainforest-alliance.org/business/sas/wp-content/uploads/2017/11/14_sexual-harassment_en.pdf

From the sustainability standards, certification schemes, and their accreditation bodies to the auditing companies and industry associations, every organisation has a role to play when it comes to mainstreaming gender equality into audits and to ensuring that auditors have the knowledge and competence base that is needed to effectively do so.

Voluntary Initiatives and Certification Schemes

Set the requirements that auditing companies and social auditors must follow to meet the qualitative expectations of the schemes. Verification schemes such as Fair Wear Foundation train their auditors and complaints' handlers on an annual basis, bringing in local union representatives to get better insights into local challenges. Gender-based violence, discrimination, and wage gaps are more specifically touched upon during these training, and the focus is on country specificities and challenges.

Accreditation Services

Translate the requirements of the various schemes for auditing companies and auditors, including verifying their adherence to these schemes. These accreditation services are perceived as the safeguards of the quality of audits and therefore underpin the credibility of the various schemes. Accreditation Services International (ASI)¹¹ and Social Accountability Accreditation Services (SAAS) are assurance partners for leading voluntary sustainability standards and initiatives around the world and SA800 certification respectively. ASI offers international accreditation to auditing companies to audit against voluntary sustainability standards and has recently launched the ASI Social Competence Center for its own assessors, who are verifying whether auditing companies are compliant with the schemes' requirements (through head office checks and shadow audits). This centre's primary objective is to identify the training needs for each voluntary and certification scheme and to provide feedback to schemes where there are opportunities for alignment.

Auditing Companies

Implement the requirements of each scheme. Auditing companies have a role to play in the continuous improvement of their auditors' competence and knowledge base. Effective auditor training on gender-sensitive auditing is crucial to improve the ability of social auditors to unearth gender-specific issues.

Industry Associations

Harmonize and align basic requirements in the social auditing industry to establish a level playing field. The Association of Professional Social Compliance Auditors (APSCA) was created in 2015 to enhance the professionalism, consistency, and credibility of individual auditors and organisations performing independent social compliance audits.¹² APSCA's certification process aims to ensure that auditors have consistent training, education, background checks, and demonstrated competencies, which are standard requirements in comparable professional auditor associations. To this effect, APSCA has developed an auditor competency framework and conducted auditor certification pilots in Turkey and China since 2017.

Recommendations

- Gender-sensitive issues should be mainstreamed in auditor training and certification exams, such as those provided by APSCA. Exams should more thoroughly and more regularly test candidates' understanding of the complexities of gendered cultural norms. The focus on testing systems thinking and analytical skills should also be strengthened to encourage cross-issue problem solving. Integrating a gender component in auditors' continued professional development would be a significant next step towards gender mainstreaming.
- Regional auditing company offices should ensure that they consult relevant stakeholders and grassroots organisations on gender issues on at least an annual basis and ensure that the collected insights are cascaded to all their auditors, for example through training (see next recommendation). Sufficient time should also be regularly allocated (every three months) for information exchange on specific gendered non-compliance amongst the regional offices and other offices worldwide to facilitate feedback and to enable auditors to learn from each other's experiences. The collected insights should also be used to train regional managers, reviewers of audit reports, and audit coordinators, who usually do not participate directly in audits but who are crucial to audit outputs.
- Regular training on gendered issues—including specifically on gender-based violence, gender discrimination, and gendered health and safety considerations—should be provided by auditing companies to their auditors. This training should be developed and facilitated with the support of local stakeholders who have a comprehensive understanding of specific contexts and gender norms.
- Informal company-agnostic regional auditor networks should be established to share and capitalize on auditors' knowledge and experience.
- Voluntary sustainability initiatives and certification schemes should align on requirements and best practice guidelines for auditing gender-sensitive issues.
- Accreditation bodies who accredit auditing companies on the basis of sustainability initiatives and certification schemes' requirements, such as SAAS and ASI, should verify on a continuous basis that auditing companies conduct effective and regular stakeholder consultations and internal exchange of information, and that gender is an integral part of these exchanges.
- Some participatory multistakeholder social auditing approaches or certification schemes recommend the inclusion of a social science expert¹³ and of trade union and/or NGO representatives during social audits. While this approach is difficult to mainstream for traditional company code audits, it is recommended that this should be considered at least for complex local environments and issues.

Audit Purpose and Design

¹⁴ www.bibalex.org/Search4Dev/files/431941/460338.pdf

¹⁵ www.ids.ac.uk/files/dmfile/Wp237.pdf

The purpose of conducting social audits within supply chains will vary from one company to another, ranging from a basic risk-management-driven approach (mostly triggering quick fixes) to a more meaningful engagement on management systems, requiring long-term changes.

In most cases, elements of both approaches will drive the use of social auditing. The objective of the audit should determine the design of the questionnaire and the underlying methodologies. In the case of gendered issues, long-lasting change is best achieved through a substantive management-systems approach. This requires the active participation of the supplier and women and men workers to identify realistic solutions. In traditional social audits, very little attention is given to gathering insights that could contribute to designing effective remediation solutions.

The cost effectiveness of social audits has long been questioned. The UK Ethical Trading Initiative reported in 2006 that its member companies spend on average around three-quarters of their social compliance budget on audits, leaving very little budget for the remediation of issues.¹⁴ Today, in a context where compliance budgets are shrinking and more focus is given to remediating the issues, the appetite for investing additional resources in better-quality audits remains low—and even more so when a growing number of suppliers are expected to absorb the cost of it. In auditing, as for many other activities, time translates directly into costs. A time limitation on an audit has an impact on its quality and effectiveness as it:

- Forces auditors to focus merely on what is visible and easily verified, such as in-site observation and review of documents. Data from a major ethical audit database has revealed that of all gendered violations identified in social audits, an average of 32 percent are related to the absence of policies on discrimination and sexual harassment. While policies are important and a necessary first step, they do not accurately reflect the existence of sexual harassment or discrimination.
- Reduces the time spent on worker interviews, which are the main source of information on less visible issues such as gender discrimination. This represents a challenge for gender-sensitive issues, which are more complex to uncover and may benefit from a more focused individual interview setting, sometimes even outside of the production site.

In addition, most current audit practices still focus on controlling and verifying separate factors, omitting any analysis of the reasons for the issues. This narrow focus is explained by the systematization of the exercise, the cost/time pressure, the breadth of issues, and (in many cases) the absence of the expert knowledge required to understand the issues and, where needed, identify realistic customized solutions.

Finally, within current audits, workers tend to have a passive role, rather than being considered as an active source of information or, more importantly, as a force for change. By shifting part of the ownership for workplace improvements from management to workers, some more advanced MSIs have started giving elected worker representatives, worker committees, or combined worker management teams a prominent place in their standards and associated audit process requirements. From interviews to the pro-active management of corrective action plans, these teams allow for “ongoing monitoring” beyond the audit itself.

Recommendations

- Audits should systematically build in time for pre-audit information collection, which requires investigating the community around the audited site through informal conversations and observations. That way, auditors are pre-sensitized to some of the gendered issues that they may encounter when auditing the supplier site and can adapt the focus of the audit and the interview questions accordingly.
- Mutualisation of audits is an effective way of minimising the overall cost burden. In this context, companies should invest in fewer but better-designed audits, allowing enough time for auditors to conduct thorough worker interviews, probe complex gendered issues, and exchange findings within the audit team to ensure an effective closing meeting.
- Companies should question the objective of auditing in the continuous improvement process and consider which stage is the most appropriate for conducting social audits. Consideration should be given to whether different approaches should be adopted. The approach may depend on a variety of factors, including the supplier's understanding of gendered issues and its willingness and capacity to address them effectively. Social participatory approaches consider the social audit as an outcome rather than the means to improvement. Their objective is to help the supplier achieve successful compliance, rather than being policed or reprimanded for failure to comply. This approach involves several steps, from awareness raising to pre-audit, with the final audit being undertaken only once improvements have been achieved.¹⁵ This is particularly relevant in the context of gendered issues, which overall require more medium- to long-term responses.
- Audit methodologies should focus more on systemic thinking and root cause analysis. This will enable them to be more effective at picking up on less visible issues and to design more effective remediation plans overall.
- Audit methodologies should actively engage worker committees (when they exist) within the auditing process and the design of corrective action plans, and should encourage ongoing monitoring.


Reporting of Uncorroborated Issues, Sensitive Issues, and Critical Non-Compliances

¹⁶ www.theconsumergoodsforum.com/wp-content/uploads/2017/12/GSCP_Audit_Process_Methodology.pdf

It is standard practice in the auditing industry to treat in confidence findings that could potentially represent a threat to the worker reporting the violation or to the auditors themselves. Auditing companies are expected to have procedures in place to report these sensitive findings to the audit requestor (traditionally the company), outside of the written social audit report. This is considered good practice within the industry.

Auditing companies therefore use their own version of “alert notifications” or “supplementary reports” (for which templates are provided by organizations such as GSCP¹⁶) to report to the audit requestor on the following issues:

- Non-compliances classified as critical (which would include sexual harassment of workers)
- Confirmed sensitive non-compliances that pose a threat to workers’ well-being or the audit team itself
- Concerns that cannot be substantiated through evidence and/or interviews (which would apply to gender discrimination cases)

A photograph showing a man with a mustache, wearing a blue and white checkered button-down shirt, sitting at a dark wooden table. He is looking towards the right side of the frame. In the foreground, there is a clear plastic water bottle with a blue cap and a smartphone on the table. The background is slightly blurred, showing what appears to be a meeting room or office setting.

“ Most of the critical gendered issues may not be directly discussed with supplier management at the closing meeting nor reported in mainstream audit reports.

GSCP Guidelines | Reporting Sensitive Information

3.1 The auditing body has a procedure in place to report to the audit requestor and when required or otherwise applicable to an appropriate accreditation body or standard or code owner or client:

- Any information or indications regarding abuse or harassment of workers or breach of the law at a site being audited where the auditor has been unable to verify the information
- Any information regarding the abuse or harassment of workers or breach of the law at a site being audited where reporting the issue directly to management risks putting workers or other staff members in danger
- Any information regarding critical non-compliances. [...] Where a 'critical' non-compliance is identified, the auditor should, wherever possible, inform the audit requestor within 24 hours. If the audit requestor is on site, the auditor should communicate the critical non-compliance immediately. This will enable the audit requestor and the employment site to work together to plan an appropriate and timely resolution to the issue. Please note that if an auditor believes they might be at risk as a result of communicating a critical non-compliance, the audit team should wait until it is removed from that situation before issuing the alert notification. Auditors should prioritise the welfare of workers when deciding how to inform employment site management of any critical non-compliance. Auditors should follow the escalation policies of the audit requestor to minimise any risk to workers.
- Any attempt to bribe, coerce or threaten an auditor, audit reviewer, or audit administrator. The auditing body ensures that information is treated sensitively in accordance with its confidentiality policy.

Source: https://www.theconsumergoodsforum.com/wp-content/uploads/2018/01/GSCP_Reference_Tools_AC_2014_interactive.pdf

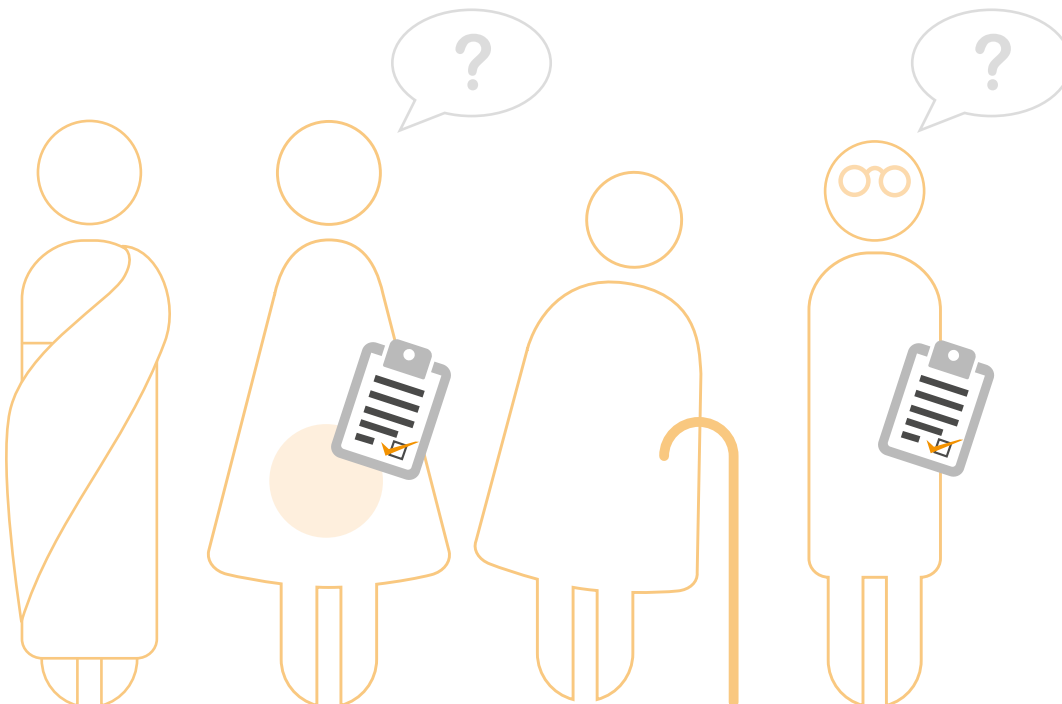
These sensitive findings are not discussed at the audit closing meeting with the supplier and do not feature in the final social audit report. This procedure leaves scope for the auditor to interpret the findings and assess the risk. It also means that most of the critical gendered issues may not be directly discussed with supplier management at the closing meeting nor reported in mainstream audit reports. However, some auditing companies attempt to circumvent these challenges and find ways to raise “sensitive issues” as non-compliances in the main report. For instance, one auditing company reported that upon finding uncorroborated cases of sexual harassment, the auditor raised a non-compliance under the grievance mechanism issue category in the main audit report, in addition to separately reporting on the issue to the audit requestor via alternative channels.

The existence of alternative confidential channels to report sensitive and uncorroborated issues may have implications on:

- The reputation of social audits. This practice may partly explain why most traditional social audit reports identify very few incidents of discrimination or sexual harassment. When reported cases of sexual harassment have been identified during the social audit, these will rarely feature in the final auditing report.
- How these issues are captured and addressed by companies. Because these findings are not necessarily captured by companies' mainstream compliance management systems—which are based on audit report findings (including through social audit data platforms and the associated triggered follow-up mechanisms)—the onus is on the company that receives the information from the auditor through alternative channels to integrate this finding into the mainstream compliance system and processes (including whether it falls in the scope of zero tolerance policies, supplier scorecards, and remediation processes). This practice enhances the likelihood that these types of issues will fall off the company's radar and decreases the likelihood of their being proactively managed. In addition to the risk that these crucial issues may not properly be addressed, this practice may also falsely convey the impression that incidents of gender discrimination or sexual harassment do not occur.

An increasing percentage of suppliers are now encouraged to commission audits independently. This has been a growing trend in the past decade, with companies passing on the cost of audits to suppliers, with the aim of incentivizing suppliers to take ownership of their own social performance and drive meaningful workplace improvements.

This situation may result in suppliers becoming judge and subject of the audits they commission, without any accountability mechanism to their customers. This may also prevent auditors from communicating to other external parties (customers) about any critical sensitive non-compliance or uncorroborated issues. This increases the risk that these sensitive issues will at best be ineffectively addressed or at worst will not be addressed at all.



¹⁷ www2.nkfust.edu.tw/~percy%20/Report6/TheRoleOfTrustAndRelationshipStructureInImprovingSupplyChainResponsiveness.pdf

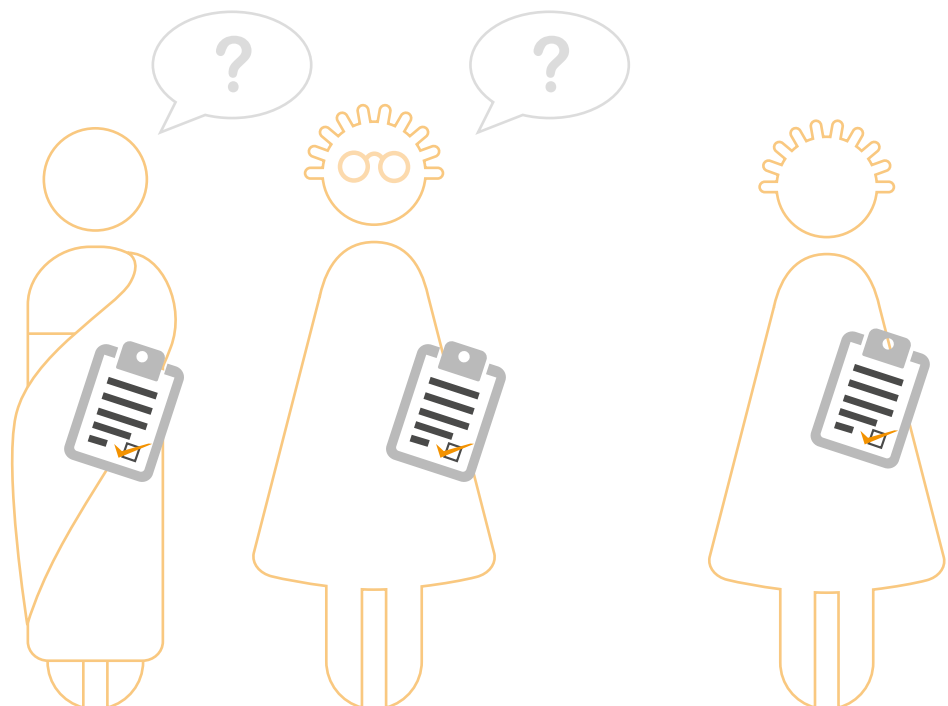
¹⁸ www.theguardian.com/business/2010/nov/21/monsoon-child-labour-india

Whilst there is a risk that with the current process, specific types of gendered issues slip through the net and are not adequately captured and addressed, some other perspectives must be considered. One is the view that in most cases, sensitive issues may be better discussed and remediated through continued dialogue between the company and the supplier rather than through the mediation of an independent social auditor at the audit closing meeting. In the context of typical code of conduct/brand audits where most auditors go from one job to another (as opposed to certifications where there is continuity in the monitoring and follow-up process), raising these issues with management can be challenging, as auditors are not able to guarantee that management will not reprimand workers or take more severe action for speaking to auditors.

Effectively managing and remediating sensitive issues, such as reported cases of sexual harassment, requires an established environment of trust and collaboration between the company and the supplier, rather than quick abrupt fixes. In fact, in some cases trust (as opposed to compliance) has been identified as a powerful control mechanism that can enhance suppliers' responsiveness, especially in cases where the company has little formal control of and leverage over its suppliers.¹⁷

A greater emphasis on supplier engagement that facilitates the creation of shared values and understanding in the supply chain, coupled with continued commercial incentives, is more likely to be successful in addressing more complex and deeply-rooted issues than the traditional compliance approach. In addition, when it comes to the integration of these issues within the final audit report, there is little incentive for companies to have this information captured in final reports, as such reports may be more widely circulated and may be used by stakeholders to denounce companies' involvement in poor labour practices.¹⁸

Overall, the perspectives above highlight the complexity of raising and managing sensitive issues that emerge from social auditing, with gender-related issues being only one category of sensitive issues. Any solution to this challenge should be designed in conjunction with the variety of stakeholders involved, with the primary objective of making gendered issues more visible, thereby allowing for meaningful targeted remediation.



¹⁹ www.sustentables.org/Documentos/RA2017/RA-P-SP-1-V1.2%20Sexual%20Harassment%20Policy.pdf.

Recommendations

- Finding evidence to corroborate information surfaced through worker interviews on issues such as sexual harassment and gender discrimination may be difficult. Time constraints, auditor experience, and competence are determining factors, as are the very volatile nature of the issues and the willingness of workers to voice them. There is a real need to establish mechanisms that trigger systematic timely follow-up investigations of uncorroborated suspicions of discrimination and sexual harassment that fall outside the recorded non-compliance report. Some assurance schemes have issued guidance advising auditors that non-compliances for sexual harassment should be raised (and recorded) on the basis of probative facts (facts that make the existence of something more probable or less probable), without requiring triangulation.¹⁹ In that sense, aligned and coherent information gathered during worker interviews has probative value and can be integrated into final reports, assuming there is no identified risk to the worker.
- Where the audited site is itself the audit requestor (within the context of a customer-client requirement), the auditor should ensure that an agreement is in place with the employment site to allow the auditor to communicate audit findings and any alert notifications to any customers concerned. This will increase the likelihood that any critical gender-sensitive issue or suspicion of violation is taken up and addressed.
- Accreditation bodies and standard-setting initiatives should play a role in centralizing the reporting of uncorroborated issues and critical non-compliances that do not make it into the audit report, and should facilitate appropriate, timely remediation efforts.
- Companies should ensure that any gender-sensitive issues communicated through alternative communication channels are fully integrated within in-house management systems, remediation follow-up discussions, and actions with their suppliers.

Capturing and Reporting on Data Disaggregated by Gender

A widespread business dictum holds that “you manage what you measure”.

When companies do not collect and analyse data on women, they contribute to rendering women and their issues invisible from a management systems perspective.

Addressing this data gap is an essential part of the journey to improve working conditions for women and to advance gender equality in the workplace. In short, companies must collect gender-disaggregated data and measure the impacts of interventions. However, there is little reliable data available at the supply chain level. This is both because audits often fail to collect meaningful gendered information and because supplier management systems generally do not routinely gather gender-disaggregated data beyond overall company employment statistics. It is difficult for an auditor to measure and understand the underlying trends affecting women in a specific workplace if data disaggregated by gender is not available at the worksite level during the audit. Gathering and analysing data about women’s and men’s needs, risks, barriers, experiences, and aspirations are key to better understanding gender dynamics and opportunities for improvements.

The context in which the data is collected is crucial, as gender issues are interwoven with cultural, social, and economic issues. The data collection process should allow auditors to generate insights into if, when, how, and why situations are the same or different for women and men, and the type of implications that this has for equitable workplace policies and practice. For this purpose, gender-disaggregated data should also be analysed through the lens of other determining factors such as age and job category.

It is important to underscore that collecting gender-disaggregated data should not represent a significant additional workload once a company ensures that this data is reported routinely as part of existing data management systems for operations, health services, human resource, and other functions.

 Did You Know?



BSR’s Gender Data Framework



To help business do its part to promote stronger collection and use of gender data, BSR launched a major new initiative in September 2018 to develop a gender data framework for global supply chains. This framework will serve as a practical, credible guide, defining which gender indicators are needed to monitor corporate progress toward gender equality in supply chains and to guide future investments. BSR will partner with ISEAL Alliance—with inputs from the UN Global Compact, UN Women, Fair Wear Foundation (pro bono), and the Ethical Trading Initiative (pro bono), and with support from the C&A Foundation—to develop the framework. Fair Wear Foundation and select companies will test the framework. The framework will be business-driven and practical and will support companies in making more efficient and impactful investments in gender equality.

The gender data framework will allow for: reliable, disaggregated data collection on the status of women in global supply chains; robust monitoring of progress toward gender equality and effectiveness of current efforts; better-informed investments and decision-making by companies and MSIs; a community of companies and MSIs with increased capacity to track and communicate collective progress toward gender equality; and stronger, more adaptive gender equality initiatives that drive improved outcomes for women in global supply chains. [Read more.](#)

Recommendations

- Multistakeholder organisations (MSIs), standard setters, business associations, and NGOs should provide common guidance to companies on a consistent minimum core set of gender KPIs to collect and report on.
- Companies should ensure that their suppliers collect data disaggregated by gender so that progress over time can be tracked. Companies should provide adequate management systems support to their suppliers to ensure data collection is effectively conducted and integrated into business-as-usual.
- Auditors should systematically collect more detailed data disaggregated by gender to spot trends that may reflect discriminatory practices or inform factory-specific women's empowerment programmes. From the systematic collection of job applicants' data and data on types of jobs occupied to health data collected by medical on-site facilities and the number of gender-specific grievances logged, data should be disaggregated by gender to enable the auditor to analyse the different impact of existing worksite policies and practices on women and men.
- Assurance providers and auditing companies should consider sharing gender-disaggregated data on audit results with MSIs and relevant stakeholders to inform and support strategies to tackle gender-based discrimination and violence.
- Audit protocols should be revised to incorporate a dedicated space for the collection of specific gendered data and insights or to integrate gendered data throughout the protocol.

Section 2

Integrating Gender-Sensitive Audit Verification Measures within Existing Audit Assessments



Section 2 Integrating Gender-sensitive Audit Verification Measures within Existing Audit Assessments

What Social Audits Should Aim to Verify



Existence



Awareness



Effectiveness



Transformation

This chapter provides suggestions and recommendations on how to ensure that the gender equality dimensions that BSR recommends through its **Gender Equality in Codes of Conduct** guidance—and that companies and code-setting organisations should integrate into existing codes of conduct—are effectively translated into existing assurance methodologies.

Existing auditing approaches already contain several control points. Most commonly, they will seek at a minimum to verify the existence of discriminatory and dangerous employment practices. These are predominantly linked to the reproductive capacity of women and include:

- The use of involuntary pregnancy testing as a condition of employment
- Forced use of contraception
- Termination of workers for pregnancy
- Pregnant workers performing dangerous or unsuitable tasks
- Female workers exposed to health and safety risks that endanger reproductive health
- Female workers subject to full body search by male security guards
- Reduction in wages or pay for workers who return after pregnancy

However, when it comes to gender equality, social audits should probe and verify a much broader scope of gender dimensions and do so through the lens of traditional principles included in existing codes of conduct, as recommended in the **Gender Equality in Codes of Conduct** guidance. Indeed, while most think of gender discrimination as solely relevant to one principle (non-discrimination), gender discrimination can be the root cause of non-compliance related to other principles such as employment relationship, wages, working hours, and forced labour.

In addition, social audits—if they are to be truly effective and gender sensitive—should strive to capture not only the existence of a policy or mechanism and its successful implementation but how it has been successful in positively impacting women in the workplace and in contributing to transforming gender norms. Audits should therefore aim to verify:

- **Existence:** the existence of a policy, process, service, or mechanism, promoting gender equality and addressing prominent women-specific issues
- **Awareness:** the awareness of a policy, process, service, or mechanism amongst women and men workers
- **Effectiveness:** the practical implementation and effectiveness of a policy, process, service, or mechanism to drive positive impact for women workers
- **Transformation:** the impact of a policy, process, service, or mechanism in changing gender norms in the workplace and beyond

Comprehensively incorporating the above elements would contribute to significantly transforming the purpose of the exercise, with a heavier focus on broader root cause analysis and worker impact. Doing so is challenging given the current scope and nature of social auditing. However, if audits are to help companies prepare for remediation and inform broader transformative programmes with regards to gender, these are essential objectives.

²⁰ See BSR's [Gender Equality in Codes of Conduct](#) guidance for further analysis on this.

The section that follows provides specific verification measures and detailed worker interview scenarios to help companies assess the nine traditional code of conduct principles in a gender-sensitive way:

2.1 Discrimination	page 38
2.2 Wages and Benefits	page 43
2.3 Forced Labor	page 49
2.4 Working Hours	page 54
2.5 Harassment and Abuse	page 60
2.6 Health and Safety	page 66
2.7 Freedom of Association and Collective Bargaining	page 72
2.8 Employment Relationship	page 77
2.9 Management Systems	page 82

The verification measures suggested in this section can be divided into two categories:

- Verification measures that are directly related to gendered issues (such as discrimination on pregnancy or marital grounds)
- Verification measures that are relevant to both women and men but that have a disproportionate impact on women²⁰ and that are fundamental to improving women's working conditions and overall empowerment (examples include access to effective grievance mechanisms and provision of a living wage)

For each principle, verification measures are categorized under the following dimensions:

Governance and Policy

These measures and checks focus on verifying that there is an organisational and senior-level commitment to prohibiting practices in the workplace that disproportionately harm women.

Embedding Processes into Business

These measures and checks focus on verifying that the business has effective processes, practices, and management systems to prevent, address, and resolve issues that disproportionately affect women. Auditors should also look for evidence that these commitments are embedded into company culture, including through awareness-raising activities and communication to—and training of—key functions, supervisors, and the rest of the workforce.

Worker Impact and Gender Norms

These measures and checks focus on verifying that policies, processes, and practices are effective in driving positive impact for women in the workplace or are (at a minimum) not actively harmful to women.

This section provides a comprehensive overview of the gender equality considerations per principle assessed. Given the interconnectedness of principles (such as wages and working hours), some measures may feature in relation to several principles. It also provides practical tips, case studies, and gender-sensitive cues for auditors, all of which should help auditors to identify gender-related issues during social audits.

2.1 Discrimination

Women and men face different discriminatory practices through various aspects of the employment relationship, from recruitment to remuneration, benefits, training, promotion, and termination.

Some of these gender-related practices may be very subtle and difficult to identify without a deeper analysis of the context and root causes. Others are relatively obvious and linked to women-specific matters, such as maternity or motherhood. The verification measures below aim to expose issues related to occupational gender segregation, gender bias in recruitment and termination, denial of maternity benefits, equal pay, and discrimination with regards to employment status, training, and promotion.



What Auditors Have Experienced

- “ On reviewing application forms, an auditor in Vietnam noted that application forms obliged female applicants to disclose their date of marriage. When managers were asked about this, they said that they wanted to know so that they could gift a rice cooker to the female employees on their wedding anniversaries. Further investigation revealed that female applicants who had married in the past year had been screened out for interviews because of the likelihood of pregnancy.
- “ When a woman in a leadership position becomes nervous or takes harsh actions, everyone assumes that she is menstruating. When a man does the same, people find it normal and consider him firm and resolute.



2.1.1 Verification Measures

Discrimination

Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Check the existence of a non-discrimination policy and how it addresses factors such as gender, marital status, and pregnancy (amongst other grounds). In particular, note any statements that reference or explicitly prohibit questions about pregnancy status or conducting pregnancy tests as a condition of hiring or continued employment.
- Check that non-discrimination policy refers to existing available channels for workers to raise issues and complaints based on discrimination.
- Examine hiring and termination policies, including contractual termination conditions for discriminatory practices.
- Check code of conduct posted on factory walls for explicit mention of non-discrimination clause

Leading suppliers will be able to demonstrate evidence of a diversity policy which includes target setting and monitoring.

Embedding Processes into Business

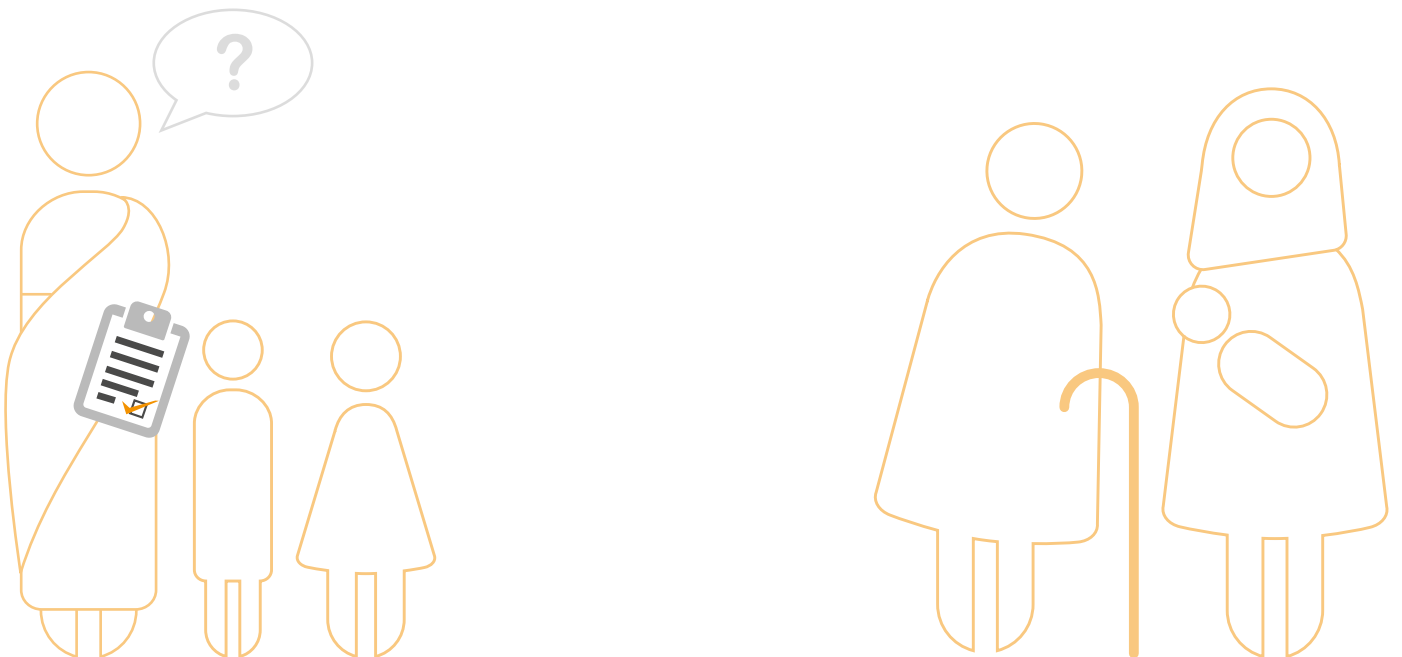
The following measures should be taken to verify the integration of gender within the business processes:

- Record national and local laws relating to sex-based legal differentiation that affect women's ability to work in the same way as men, and record how the company manages this.
- Check that there is no procedural discrimination against women, especially in relation to wages, bonuses, and other benefit calculations linked to working hours, marital status, pregnancy, or maternity leave.
- Examine the recruitment and termination processes and management systems for: advertising and hiring, interview selection, typical interview process, interview questions, and termination. This should include:
 - Recruitment procedures (including health checks such as pregnancy tests), information required in application forms, contractual terms linked to marital status or pregnancy
 - Grounds of previous resignations or dismissals including disciplinary and notice letters to workers highlighting any discriminatory trends (including the presence of pre-signed resignation letters in women's files in case of marriage or pregnancy)
- Check available training courses (rights-awareness raising and/or professional development training) and on what basis they are offered and whom to. How is this communicated? Do the training modalities (location, timing, etc.) make it difficult for women to take part?

Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impact on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks to note facts such as:
 - Comparison of workforce composition by category of workers (supervisors/managers versus workers)
 - Comparison of women short-listed for interviews versus number of women applicants
 - Number of women on maternity leave/returned from maternity leave
 - Training records to evaluate training uptake by gender
 - Number of women promoted in the past 18 months
 - Pay by hour, piece rates, etc. versus a salary (include an overall percentage comparison of total workforce by gender, marital status, etc.)
 - Number of dismissals/resignations due to family responsibilities, marital status, or pregnancy, including records of any exit interviews and feedback loop
- Measures of worker impact and empowerment (assessing women's awareness and agency and workplace practices impacting women) through interviews:
 - Check understanding of policies, processes, and grievance mechanisms. Are workers aware of non-discrimination policies? How can workers raise concerns and what are the procedures for remediation?
 - Do workers feel discriminated against at any stage of employment (recruitment, access to training, promotion, return to work after maternity, access to benefits, termination)?
 - Do workers with family responsibilities feel that they are treated in the same way as other workers and are able to access all the same benefits, training, and development?
 - Do workers feel that there are any cultural or gender norms within the organisation that impact their workplace opportunities and benefits?





2.1.2 Sample Worker Interview Scenario

Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on equal opportunities and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Discrimination/Equal Opportunities: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 I had a chance to visit a few of the communities that surround the industrial park. Do you live in one of those communities or are you further out? How long have you lived there?</p> <p>2 I heard that it is not easy to find a job. Would you say that many people feel like this?</p> <p>3 How do people hear about job opportunities? Do they go knocking on doors, look in the newspaper...?</p> <p>4 People have told me there were certain jobs that women could not apply for. Does that sound familiar? How so?</p>	<p>Clear difference in general work opportunities between men and women at community level</p>	<p>Building Rapport</p> <p>Question Type: Mix of Indirect and Open-Ended</p> <p>Technique: Deliberate Loading</p> <p>Formulation: Question flow is from high to detail level</p>
<p>5 That's very interesting (continuing from the above set of questions). Within the factory, how do people hear about job opportunities? [If no answer, give certain examples such as listed on a billboard or announced on the speaker.]</p> <p>6 For someone to present themselves for a new job opportunity, I assume the individual in question needs certain new skills to perform the new job. How does one go about obtaining these new skills? [Let the worker bring up trainings.]</p> <p>7 Are these trainings you mentioned available for all? How can you sign up for one? How do workers know when and where they take place?</p>	<p>Equal (or unequal) coverage of training and job opportunities that reach all workers</p>	<p>Bulk of Questions</p> <p>Question Type: Open-Ended</p> <p>Technique: Context Setting (based on building rapport section)</p> <p>Formulation: Building on previous section and level of detail</p>
<p>8 Ah okay, so there's a way for workers to sign up. Who do you go to to sign up? Is he/she the only person you can go to?</p> <p>9 In my experience, I remember a time when I felt really intimidated by the person who had that power in my workplace because he preferred those workers who socialized with him or who did him favours. Have you ever felt intimidated in a similar way?</p> <p>10 Are there workers who feel like they don't have a chance to be considered for a promotion?</p>	<p>Is favouritism happening?</p> <p>Are women workers at a disadvantage and placed in positions that would make them perform certain services to be promoted?</p>	<p>Delve a Little Deeper</p> <p>Question Type: Open-Ended</p> <p>Technique: Deliberate Loading</p> <p>Formulation: Familiar Wordings</p>

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>11 Would you say many workers would like to be promoted? Both men and women?</p> <p>12 Do you feel that women who have families feel they can pursue promotions? Or is it too stressful to think of taking on more responsibilities at work?</p> <p>13 Do you think women should go after promotions or do you think men are better suited for promotions?</p> <p>14 Do you think your organisation supports or would like to support women for promotion?</p>	<p>Is the professional ambition present for promotions?</p> <p>What is the general attitude toward women and men who present themselves for promotion?</p>	<p>If time allows: Concluding questions that end interview on a positive and high-level note.</p> <p>Question Type: Indirect Questions</p>



Example of Gender Lens Integration

Social & Labour Convergence Project Assessment Tool | Discrimination

The **Social & Labor Convergence Project (SLCP)** aims to bring together unique perspectives to create an efficient, scalable, and sustainable solution for social audits. It aims to become the first industry-wide framework to assess social and labour conditions. This framework includes a standard-agnostic tool and verification methodology that collects objective social and labour data that stakeholders can use to identify opportunities for improvement and track progress. The SLCP has integrated key gender-specific questions and checkpoints into its new assessment tool:

Sub-section	Category	Number	Question	Response
Discrimination	Pregnancy	Disc-3	Does the facility follow any of the following practices related to employee pregnancy (select all that apply)	<ul style="list-style-type: none"> ■ Facility requires pregnancy test at hiring or at any time during employment ■ Facility requires employees to provide commitments (verbally or in writing) that they will not become pregnant ■ Facility requires the use of contraceptives or other forms of birth control ■ None of the above

2.2 Wages and Benefits

²¹ www.capturingthegains.org/pdf/ctg_briefing_note_6.3.pdf

Women are not only paid less than men for the same work or work of equal value, they also receive fewer bonuses and are more often paid by the hour.²¹

This is not only because societies attribute different values to the work performed by women and men but because of the types of precarious jobs (part-time, temporary, casual, piece-rate, by the hour) that women tend to occupy. These jobs oblige women to work more hours for less pay. In addition to these issues, a lack of financial literacy, which is common amongst women workers, facilitates supplier mispayments.

With regards to benefits, maternity and sick leave generate specific challenges. Women may face discrimination and employment issues even when maternity leave is guaranteed by law. The verification measures on the following pages will support the identification of these considerations.



What Auditors Have Experienced

- “ In the packing and quality control sections of manufacturing industries (such as plastics and electronics), while the main process is usually performed by machines and male workers, specific manual tasks (such as packing and final quality control) are performed by women. These tasks have significant value in preventing wastage and complaints. However, they are poorly paid as they do not require technical knowledge and are somewhat monotonous. The women working in these jobs are frustrated because they know the value and impact of their work.
- “ An interview with management found that higher-value goods were being produced in the evening or during the night shift, when women are not allowed to work. Work and associated bonuses had been structured specifically to exclude them.



2.2.1 Verification Measures

2.2

Wages and Benefits

Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Ensure that there is no policy or procedural discrimination against women, especially in relation to wages, bonuses, and other benefit calculations linked to working hours (including overtime), marital status, or maternity leave.
- Check policies and workers' contracts to ensure that workers can access benefits such as maternity, childcare benefits, sick pay, or flexible working without discrimination or deductions, etc.
- Check codes of conduct posted on factory walls for explicit mention of equal wages for men and women for equal work, benefits, etc.

Leading suppliers should have a living wage policy in place.

Embedding Processes into Business

The following measures should be taken to verify the integration of gender within the business's processes:

- Review the general job structure of the workplace to check differences or inconsistencies in job descriptions that may be used to differentiate the same job by gender and thereby justify lower pay. Cross check with contracts and pay records.
- Check the calculation methodology for casual and/or piece-rate workers (who tend to be predominantly women).
- Check contracts and time off records to ensure that all available benefits such as childcare and leave are available and equally applicable to both men and women.
- Check that practices are aligned to ensure that workers can access benefits such as maternity, sick pay, and childcare benefits without deductions, including that:
 - There is no denial of sick leave (auditor should note where it is related to pregnancy or childcare responsibilities)
 - There are no unauthorized deductions (e.g. for sick leave, medical appointments, etc.)

Leading suppliers should be able to demonstrate how they ensure that workers receive and understand their payslips. Make a note of sites that provide specific training related to the understanding of wages and benefits, including broader financial literacy.

Wages and Benefits

Verification Measures

Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices and workplace culture effectively translate into impact on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks to note facts such as:
 - Compare salary between men and women by job category (and job description if rates vary)
 - Compare hourly rates/piece rates versus a salary (disaggregate by gender and other factors such as marital status)
 - Check for possible gender discrimination if overtime premium payments are paid
 - Benchmark against minimum wage and living wage benchmarks for standard hours (excluding overtime). In cases where there is a locally accepted living wage, auditors should clearly report what the amount is and how it has been calculated.
 - Compare piece rate (excluding overtime) to minimum wage and living wage benchmarks, and any associated impact on access to benefits.
 - Check whether the site has any women workers currently or formerly on maternity leave and whether/how benefits are and have been remunerated.
- Measures of worker impact and empowerment (assessing women's awareness and agency, workplace practices impacting women) through interviews:
 - Do women understand their pay slips and how their salary is calculated (especially for casual/piece-rate workers)?
 - Do women think their salary covers basic needs and allows them to deal with emergencies?
 - Do women feel they would be able to return to the same or similar position with comparable remuneration after having a baby?
 - Are women workers aware of which benefits they are entitled to? Do they feel comfortable taking these up?
 - Assess level of access to or denial of sick leave (particularly for pregnant or breastfeeding women and vulnerable workers such as piece-rate workers, who may be unable to recoup costs of sick leave linked to themselves or their dependents).

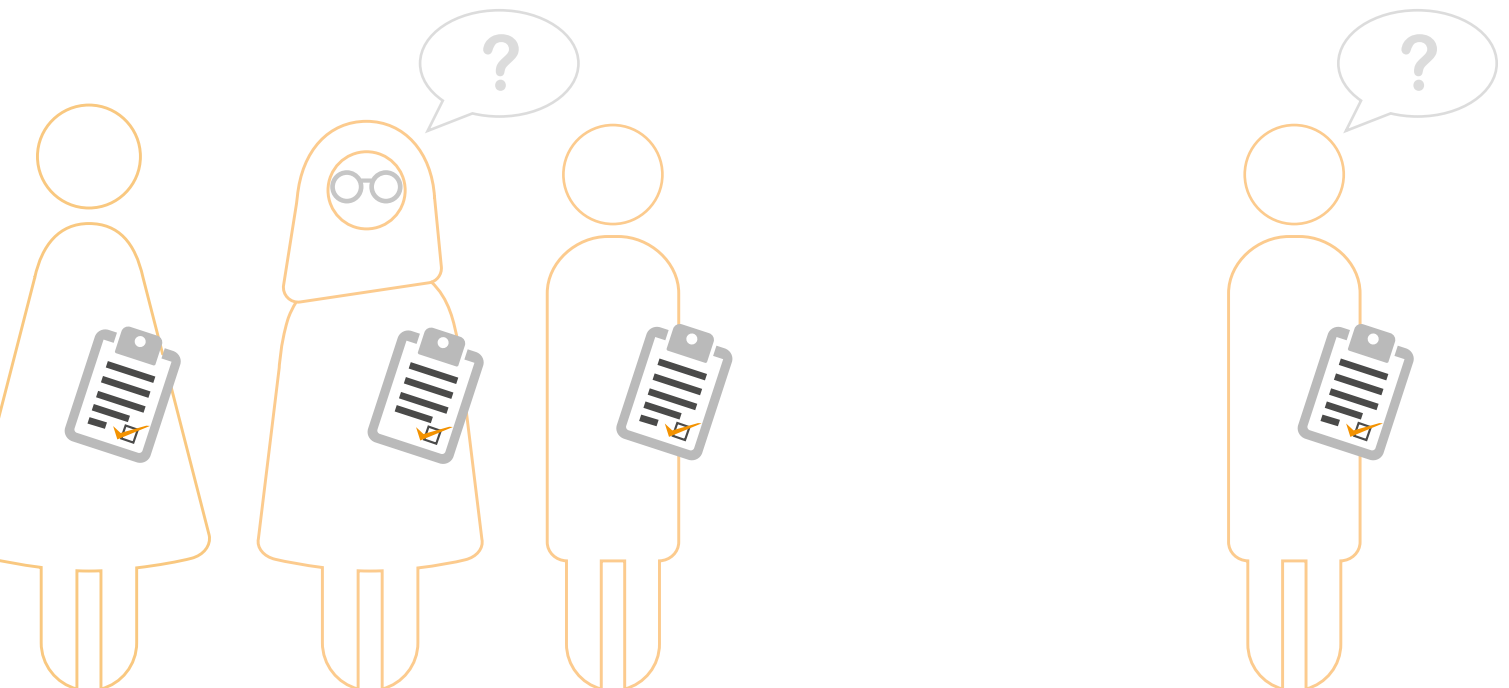


2.2.2 Sample Worker Interview Scenario

Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on wages and benefits and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Wages and Benefits: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 It seems to me like there is a good mix of new and more senior workers here in the factory. Would you say that's the case or are there more new workers?</p> <p>2 Do you get to know new workers? Would you say you have a good set of friends at the factory? When do you get to meet them?</p>	Does the worker know enough about the process new workers go through to ask questions about starting salary and expectations?	<p>Building Rapport</p> <p>Question Type: Mix of Indirect and Open-Ended</p>
<p>3 Recruitment and starting work in a new factory can be difficult; few factories have a perfect system. From the stories you've heard from your new worker friends, what was the process like?</p> <p>4 When workers present themselves for a job, they often have an idea of what it entails and what to expect. Would you say some workers are surprised by any of the recruitment phases/stages?</p>	Process for starting salary. Is everyone communicated the same wage information and does that information include the actual wage?	<p>Bulk of Questions</p> <p>Question Type: Open-Ended</p> <p>Technique: Deliberate Loading</p> <p>Formulation: Level of Detail and Building the Conversation</p>
<p>4a NO answer: So you would say the expectations from your friends were perfectly matched? There was no confusion about anything?</p> <p>4b YES answer: Walk me through the experience of your friends.</p>		



Wages and Benefits: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>5 How is the starting salary for all positions communicated? Is it just told to the workers when they apply for a position? Or are the salaries posted somewhere in the factory?</p> <p>6 Would you say new workers all start at the same pay? Or are there some that start at the same level and with the same job as others who are paid differently?</p> <p>6a YES or NO answer entails a full explanation</p> <p>7 Who gives out the money each month? Is it digitally transferred to your account or do you receive cash?</p> <p>8 Are there one or multiple people responsible for giving out monthly salaries? How does it work? Walk me through the process.</p>	<p>Are salary expectations met or is there a discrepancy in the recruitment process?</p> <p>Is the starting salary set, or are there workers who can start at a higher (or lower) wage?</p> <p>Is there a way for workers to be pressured to perform services to either receive their monthly salary or receive more?</p>	<p>Delve a Little Deeper</p> <p>Question Type: Open-Ended</p> <p>Technique: Context Setting</p> <p>Formulation: Level of Detail and Building the Conversation</p>
<p>9 Would you say workers generally get along? Is it easy to make friends?</p> <p>10 Have you ever seen workers fight or argue? What do they normally argue about? Could you give me an example of a subject that could potentially trigger a dispute?</p>	<p>Validation of the above set of questions. If workers fight, salary could be a root cause. Explore more indirectly whether there are salary discrepancies.</p>	<p>Conclusions</p> <p>Question Type: Indirect</p> <p>Technique: Context Setting</p> <p>Formulation: Familiar Wording</p>



2.2.3 Living Wage Report for Urban Tiruppur, Tamil Nadu, India

*Cost of rice and wheat (atta) in the model diet considers that workers buy a substantial portion of their rice and wheat from the Public Distribution System (PBS) for free or at a very low price per kilo.

Source: <https://www.isealalliance.org/sites/default/files/resource/2018-05/Tiruppur%20Living%20Wage%20Report%20%28FINAL%29%20May%2017.pdf>

This study, commissioned by the Global Living Wage Coalition (GLWC), brings together seven sustainability organizations: Fairtrade International, Forest Stewardship Council (FSC), GoodWeave International, Rainforest Alliance (RA) joining forces with UTZ, Social Accountability International (SAI), and Sustainable Agriculture Network (SAN), in partnership with ISEAL Alliance and Richard and Martha Anker.

The report provides the detailed assumptions and calculations made to establish an estimate of a living wage for a garment worker in Tiruppur City using the Anker methodology. The tables below provide details of the living wage estimates for Tiruppur and some of the key assumptions used to make these living wage estimates.

Tiruppur Summary Calculation of Living Wage

Family Expenses	Cost local currency (Rs)	Cost (US\$)
Food cost per month for reference family (1)	7,792	117
Food cost per person per day	64.04*	0.96
Housing costs per month (2)	4,788	72
Rent	4,000	60
Utilities (electricity, LPG, water)	548	8
Payment of interest on loan required for advance rent of six months	240	4
Non-Food Non-Housing costs (NFNH) per month taking into consideration post checks (3)	5,353	80
Preliminary estimate of NFNH costs	5,353	80
Health care post check adjustment	0	0
Education post check adjustment	0	0
Additional 5% for sustainability and emergencies (4)	897	13
Total household costs per month for basic but decent living standard for reference family (5) [5=1+2+3+4]	18,830	281
Net living wage per month take home pay (6) [6=5/number of full-time workers per family]	11,918	178
Mandatory deductions from pay (7) of 13.75% (12% Provident Fund and 1.75% ESI)	1,900	28
Gross wage required per month for living wage (8) [8=6+7]	13,817	207

Key Values and Assumptions

(1) Exchange rate of Indian Rupees to US\$	Rs. 66.88
(2) Number of full-time workers per couple	1.58
(3) Number of full-time workdays per month	26
(4) Number of hours work in normal week	48
(5) Reference family size	4
(6) Number of children in reference family	2
(7) Preliminary NFNH to Food ratio	0.687

2.3 Forced Labor

Women and girls make up more than 70 percent of the world’s modern slavery victims, with nearly 30 million female victims worldwide.²² People in forced labour represent over half of modern slavery victims.

Gender is an important factor that determines the likelihood of being in forced labour, especially in relation to specific economic activities. Women are usually associated with forced sexual exploitation and domestic work much more than with forced labour in other economic activities. However, the fact that women workers are concentrated in informal labour sectors without legal protections in the lowest paid jobs, and that they are the victims of major power imbalances within societies and workplaces (especially related to sexual abuse and maternity), makes them particularly vulnerable to forced labour. Last year, the ILO reported that women represent 58 percent of workers in forced labour exploitation in the private sector (including manufacturing, agriculture and fisheries).²³

This can be explained by:

- **The concentration of women in formal labour sectors where forced labour is prevalent:** Cases of forced labour are highly reported in sectors where women workers outnumber men, such as in the garment sector. These cases often involve such practices as debt bondage and illegal confiscation of personal identification documents, particularly where recruitment agencies are involved, such as in the electronics industry in Malaysia.²⁴ However, sexual violence and physical abuse are also used to compel labour, such as in the agriculture industry in India.²⁵
- **The increasing migration of women for work:** More subtle types of forced labour may affect women in particular by, for example, limiting their freedom of movement for security reasons. This is a particularly common practice among migrant workers, who struggle to find housing and are offered company accommodation where they are confined and/or under constant surveillance.

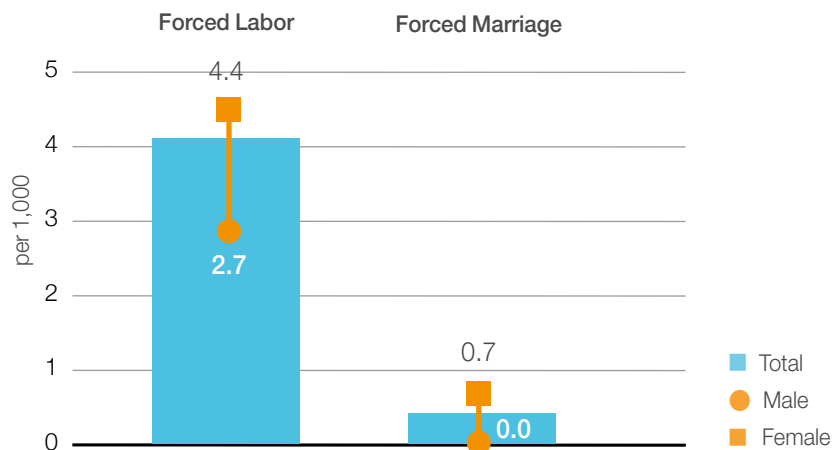
²² https://www.ilo.org/global/publications/books/WCMS_575479/lang--en/index.htm

²³ www.ilo.org/global/topics/forced-labour/lang--en/index.htm

²⁴ www.verite.org/research/electronicsmalaysia

²⁵ traffickingresourcecenter.org/sites/default/files/Women%20and%20Forced%20Labor%20-%20GFC.pdf

Figure | Prevalence of Modern Slavery by Sex, Europe and Central Asia 2016



Note on graph: The prevalence of modern slavery was much higher for females. There were 5.2 female victims per 1,000 compared to 2.7 male victims per 1,000. This overall gender gap was present both in the measurement of forced marriage and forced labour. There were also large gender-based differences in the means of coercion in forced labour; sexual violence, for example, was limited almost exclusively to female victims.

Source: https://www.ilo.org/wcmsp5/groups/public/@ed_norm/@ipecc/documents/publication/wcms_597874.pdf

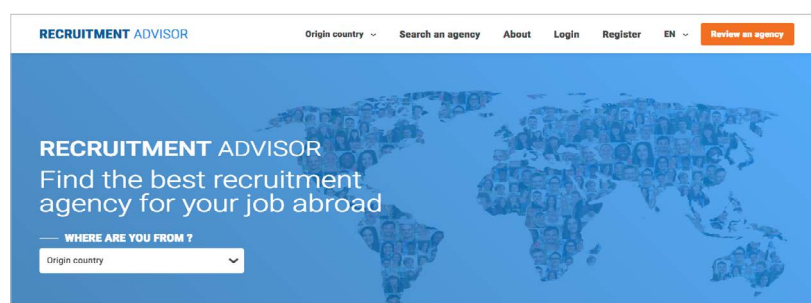
Although the main themes addressed in this section are not necessarily gender-specific, they are crucial in helping to identify issues related to forced labour that affect women. It is important to ensure:

- Equal rights for migrant workers and local employees, and additional protections for the freedom of movement of migrant workers, including an employer-pays principle for fees, prohibition of deposits, prohibition of withholding of identity documents, and a cascading of the code down the supply chain
- Prohibition of practices that restrict workers' freedom of movement or ability to terminate their employment
- Prohibition of deposits and/or financial guarantees and retention of identity documents for both male and female workers

The verification measures in this section will support the identification of these considerations.

Did You Know? **RECRUITMENT ADVISOR**

Migrant Worker “Recruitment Adviser” Platform



The **Recruitment Advisor**, developed by the ITUC with support from the **ILO Fair Recruitment initiative**, lists thousands of agencies in Nepal, Philippines, Indonesia, Qatar, Saudi Arabia, Hong Kong, Malaysia, Singapore, and other countries. The platform allows workers to comment on their experiences, rate the recruitment agencies, and learn about their rights.

Governments provided the list of licensed agencies, and a network of trade unions and civil society organisations in all target countries ensures the sustainability of the platform by reaching out to workers. Ultimately the system will promote recruiters who follow a fair recruitment process, based on the ILO's General Principles and Operational Guidelines for Fair Recruitment, and will provide useful feedback to governments regarding the practices of licensed recruitment agencies, which could be used to complement more traditional monitoring systems.

Source: www.ituc-csi.org/ituc-launches-migrant-worker



2.3.1 Verification Measures

Forced Labor

Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

²⁶www.ihrb.org/employerpays/the-employer-pays-principle

- Check policies regarding recruitment fees and deposit payments, including contracts with labour providers, and ensure that policies are cascaded and monitored. Companies should have a responsible recruitment policy, including prohibition of recruitment fees. The policy should extend to labour providers to ensure that no workers are paying to secure a job in accordance with the *Employers Pay Principles*.²⁶
- Check resignation and termination procedures to ascertain that from a contractual standpoint, workers can voluntarily leave employment with reasonable notice without penalties. Check contracts for legal terms and penalties, financial or loan agreements (linked to debt bondage), or other mechanisms to prevent workers leaving their employment. Are there any terms (contractual, financial) or intimidation (threats towards worker or dependents) that would restrict workers from leaving employment?

Embedding into Business

The following measures should be taken to verify the integration of gender within the business's processes:

- Review recruitment processes and map any intermediaries (including informal ones). If labour providers are being used, are there any due diligence processes with regards to their practices (for instance, review of job ads by employer or labour provider, particularly for jobs requiring migration)? Check that terms offered are consistent with those in contracts. What systems are in place to manage this at the site and through any associated labour providers?
- Where deductions are allowable, check any terms of repayment if applicable (and look for any discrimination in terms). Review contracts in place and check that they are understood and agreed to by worker.
- Where "pat-downs" or handbag searches are performed, these should be performed by security personnel who are of the same gender as the worker.

Leading suppliers will:

- Have processes in place to actively monitor external labour providers and any other intermediaries to ensure that no fees or deposits are being charged/withheld to secure a job.
- Provide training for security guards on treatment of workers and on preventing issues linked to discipline, harassment, or restrictions on freedom of movement.



Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impacts on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks:
 - In record checks, auditors should cross-reference sample records by gender/migrant worker status to check for differences that could flag any potential violation linked to forced labour (e.g. wages, working hours, benefits, freedom of movement).
 - Check that no recruitment fees were paid by workers (directly or indirectly via labour brokers or other intermediaries) to acquire a job.
 - Check any deductions charged to workers for PPE, identity card, accommodation, food, clothing, transportation (including migrant travel as part of recruitment or ongoing fees from provided living accommodation), health checks, work documentation, and supplies as part of their recruitment or ongoing employment.
- Measures of worker impact and empowerment (assessing women's awareness and agency, and workplace practices impacting women) through interviews:
 - Have workers reviewed, signed, and understood contract terms?
 - Have workers ever been forced to work long hours, overtime, or additional days when they did not want to, either by the site or a labour provider?
 - Are workers allowed to maintain their identification documents? In countries where this is a legal requirement, can workers access their documents at any time?
 - Assess freedom of movement of workers, including:
 - *Can workers leave site freely during breaks or at the end of their shift?*
 - *Can workers access restrooms, water, and medical facilities without restrictions?*
 - *Are fire exits unlocked and unblocked at all times?*
 - *Can workers leave their provided accommodation freely and unaccompanied if they wish?*
 - Where security checks take place, do these take place respectfully without intimidation (of worker or dependents) or detention/significant delay involving freedom of movement restrictions? Are the security guards performing "pat-downs" or searches on women workers of the same gender?
 - What training do security guards receive on treatment of workers during security checks?

Leading suppliers will:

Perform or require audit checks that take a more forensic approach to checking for signs of forced labour where workers are controlled by a third party:

- Check for signs of multiple workers being controlled by a third party (e.g. shared bank account, address, telephone number, etc).
- Check that there is only one bank account per worker and that the worker has access to it.
- Check for signs of workers being coerced through informal intermediary channels to give over part of their pay, even when hired through a legitimate labour provider. Do workers (or their relatives) have to give part of their wages away, or do they owe debts related to their arrival or work to any other agent off site or in their home country?



2.3.2 Sample Worker Interview Scenario

Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on forced labour and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Forced Labor: Sample Worker Interview Scenario

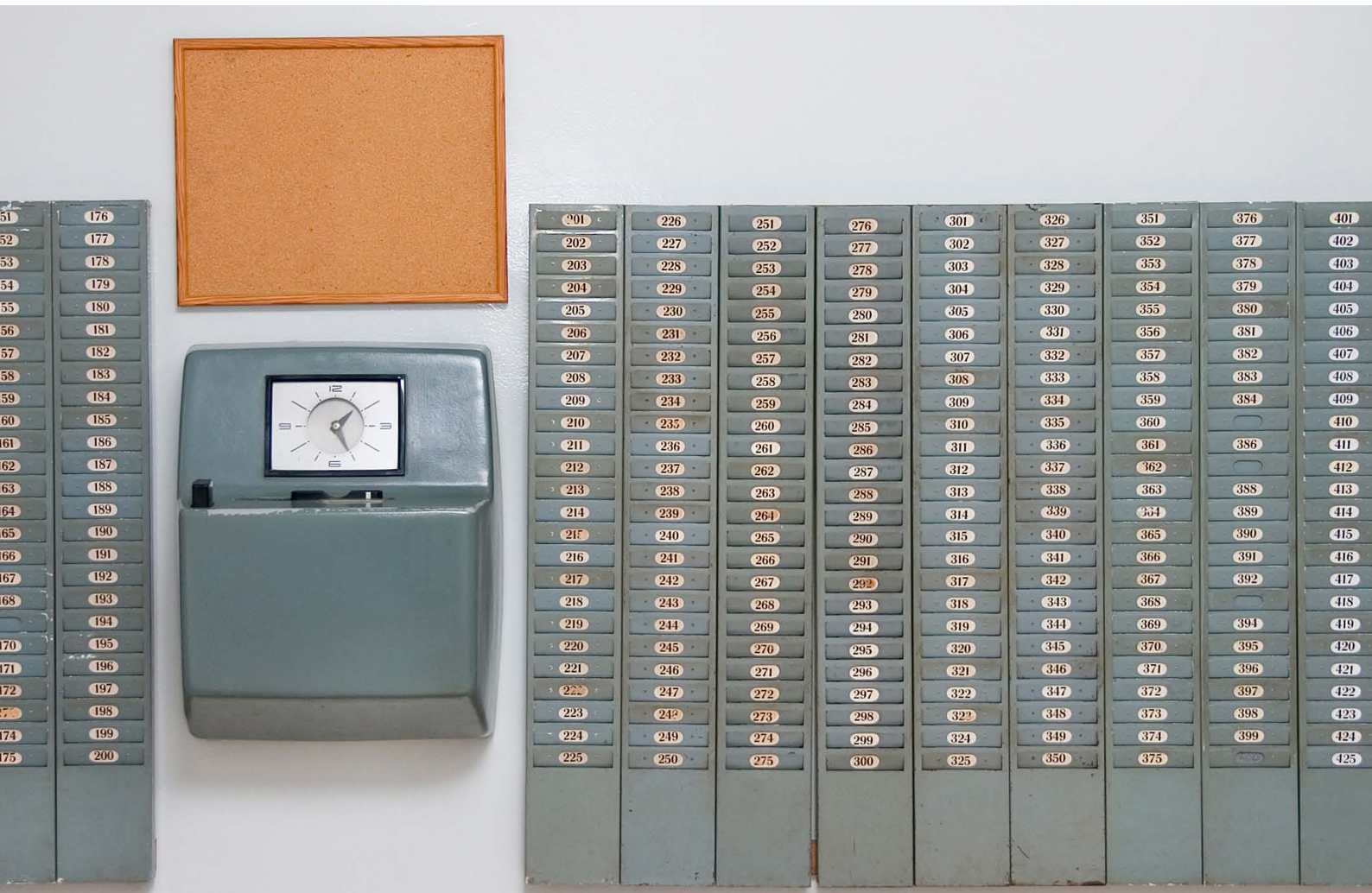
Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 Do you live around here? Where? Are you originally from there? Where were you before?</p>	Are workers originally from the area?	<p>Build Rapport</p> <p>Context Setting</p>
<p>2 I heard that some workers in the region have been recruited through labour brokers. Is this the case in this factory? Would you say that the job and conditions generally matched expectations as described by the broker?</p>	<p>Have workers being hired through labour brokers?</p> <p>Have they been subject to recruitment fees and other types of expenses?</p>	Deliberate Loading
<p>3 Are these workers integrated within the workplace? I heard that when you're not from here, you pay a deposit or a bond. Does that sound familiar?</p>		
<p>4 Did you sign a contract at the time of joining the factory? When you signed your contract, do you feel like you understood everything that was in it? If so, what were the terms? Were you happy with them?</p>	Have workers signed contracts? If so with whom (factory or labour broker?), and have they been threatened to agree to the terms?	<p>Bulk of Questions</p> <p>Deliberate Loading</p>
<p>5 Did you submit any original copy of ID or work permit to the factory management or the labour broker? If documents are withheld due to legal requirements or other, do you have free access to them?</p>	Is the facility or labour broker withholding documents, preventing workers from resigning, or limiting freedom of movement?	
<p>6 Do you feel free to resign from your job?</p>		
<p>7 I heard sometimes that workers are not allowed to move freely in the workplace and outside. Would you say that happens here?</p>	Are workers subject to forced overtime or unfair disciplinary measures?	
<p>8 It is quite common to have to work overtime, especially to meet production deadlines. What happens when a worker refuses to work overtime?</p>	Are migrant workers aware of grievance mechanisms and do they have equal access to them?	
<p>9 Are you aware of the factory's grievance and complaints procedures? Would you say that all workers use them?</p>		
<p>10 Would you say that some workers face more difficult working conditions than you? How so?</p>	Finish off on a more general question to assess if workers themselves discriminate against migrant workers.	Ease Out
<p>11 Do you get along with workers who speak another language? Are you friends with some of them?</p>		

2.4 Working Hours

Women tend to work longer hours than men and they are often in a more vulnerable position regarding their employment terms. They are also affected differently than men when working longer hours and overtime. Workers sometimes have little choice but to accept overtime and overtime is often requested at the last minute.

This may put women workers in particular in difficult situations, where they are subjected to verbal, physical, or even sexual abuse. It may also add stress as they try to balance their jobs with their caregiving and home duties. Overtime also raises security issues for women because traveling to and from work very early in the day or late in the evening may put them at risk of abuse and violence outside of the workplace.²⁷ In developing countries, workers relying on piece-rate wages often constitute a vulnerable section of workers, with many working in the informal economy. Large numbers of these workers are women. Piece rates are frequently used in certain industries or occupations where the work is repetitive in nature and where employees have a high level of control over the results. Piece-rate pay is frequent in the textile, garment, footwear, and leather industries, but also in agriculture (such as tea plucking and fruit tree pruning).²⁸

The verification measures in this section will support the identification of the existence of these issues.





2.4.1 Verification Measures

2.4

Working Hours

Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Check policies regarding any mandated regular hours and inclusion of limits on overtime.
- Check for policy commitments to provision of legally required break times and weekly rest days.
- Check for policy commitments on special leave for workers who need to be away from work and on grounds that are not covered by other types of leaves (such as maternity/paternity leave or sick leave), such as care of injured or sick dependents, special medical appointments, etc.
- Record any policies for special categories of workers, such as piece-rate workers, especially with regard to working hours, legally mandated breaks, rest days, etc.

Leading suppliers will:

- Provide policies that allow for flexible working arrangements, especially for women and men workers with family responsibilities.
- Offer opportunities to support workers with family responsibilities, such as through shared maternity and paternity policies or access to childcare support schemes.

Embedding into Business

The following measures should be taken to verify the integration of gender within the business's processes:

- Check contracts to ensure that standard working hours and ways to voluntarily agree overtime are clear. Verify that there is written evidence that terms have been understood and agreed to by all workers.
- Understand how working hours are managed and verify that the employer maintains accurate and up-to-date records of production levels and hours worked for all categories of workers. Verify that there is no discrimination embedded in the recording systems (e.g. do all workers clock in themselves? If not, who does? On what grounds?).
- Check that there are systems in place for measuring and compensating piece-rate production (including elements such as re-work) and that:
 - Piece-rate workers are not obliged to work overtime to meet minimum wage levels
 - Where they exist, production targets are realistic and achievable (assess this by comparing targets to the average output of workers who operate on standard working hours at low, average, and high season for the facility). Record compliance with legislation and variances in total and by gender.
- Check the process for distributing and agreeing to overtime (including for piece-rate workers). To whom is it offered? Is it voluntary? Are there any penalties for not accepting? Are women excluded by management from working overtime hours? Are consent forms used when women are requested to work after a specific hour?

Embedding into Business (continued)

- Review systems for site production planning and understand customer purchasing practices that could lead to excessive overtime.

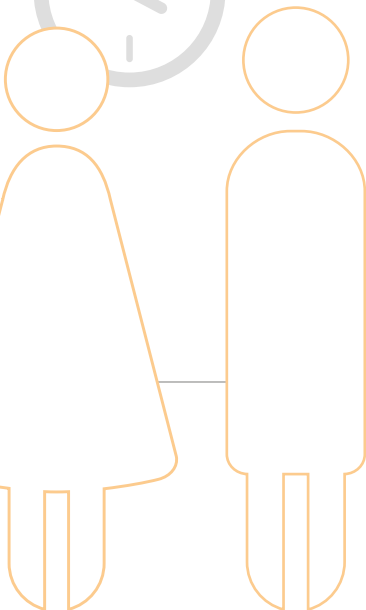
Leading suppliers will:

Continually review and offer training or mentoring opportunities to allow workers to upgrade their skills. These opportunities should help workers to better meet production targets or to learn new skills, enabling them to work across different functions. This can in turn support improved production flexibility and efficiency.

Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impact on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks:
 - Where auditors record inconsistencies related to working hours, inconsistencies should be filtered by worker type and gender to identify any potentially discriminatory root causes (excessive hours, issues related to piece-rate workers and linked to wages, process around distribution of overtime, etc.)
 - Production targets should be consistent for women and men workers for the same job
 - Where special leave policy exists, workers should have benefited from it
 - Any deductions linked to hours effectively worked should not take the income of specific categories of workers below legal minimum wage levels
- Measures of worker impact and empowerment (assessing women's awareness and agency, workplace practices impacting women) through interviews:
 - Do worker feel that production targets are realistic?
 - Is all overtime offered on a voluntary basis, and what is the process for distributing overtime amongst workers? Do women feel they have to work overtime to get an acceptable level of income or meet their targets? (How does that compare with men?)
 - Do workers feel able to freely leave the site at the end of their standard shift? (E.g. are exits unlocked and unblocked at all times; are security procedures reasonable, respectful and timely?) Are there indicators of harassment or any restrictions on freedom of movement that may make it difficult for workers to decline overtime? (E.g. provision of transport only available at end of overtime shift; threats of dismissal; ongoing employment linked to willingness to take overtime.)
 - What concerns do workers have about accepting overtime? (E.g. family responsibilities; personal safety when travelling after overtime shift.)
 - Are workers permitted paid — or unpaid — leave for non-emergency doctor visits or special situations?





2.4.2 Sample Worker Interview Scenario

Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on working hours and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

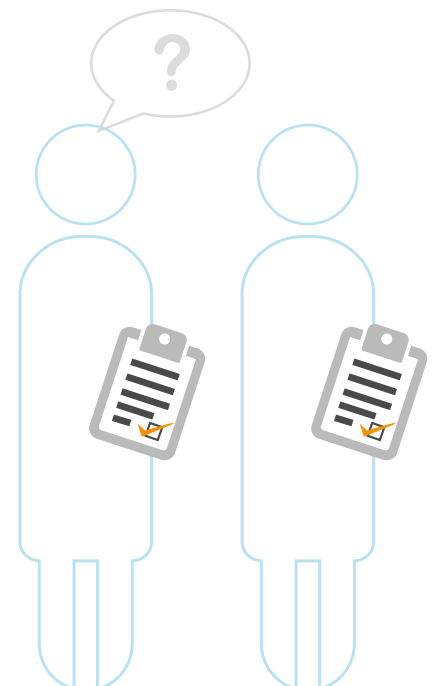
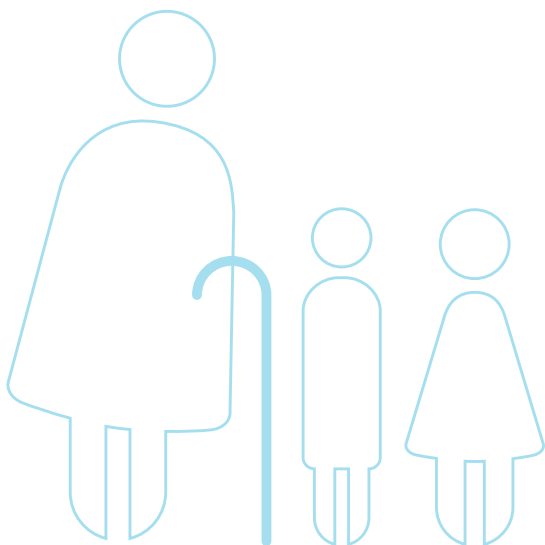
Working Hours: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 What activities do you undertake outside of work working hours (morning and evening)? Do you do these alone?</p> <p>2 Do women with children have even more responsibilities? How so?</p> <p>3 Do men contribute to household tasks?</p>	<p>Get a sense of how traditional the worker's community is.</p> <p>This will determine how nuanced your questions can/should be in the "Bulk of Questions" section below.</p>	<p>Building Rapport</p> <p>Type of Questions: Indirect</p>
<p>For Women Workers</p> <p>4 What does your day look like? At what time do you wake up? Do you have time to eat breakfast?</p> <p>5 Do you take the bus to go the work or are you able to walk? How long does it take you?</p> <p>6 At what time do you have to clock in?</p> <p>7 At what time do you normally finish your work day?</p> <p>8 When you get home, what do you do? Do you have time to cook and attend to your family?</p> <p>9 Do you normally have time to stop somewhere on the way home (grocery shopping, pick up children) or is it too late?</p> <p>10 Do you work on weekends? Saturdays and Sundays?</p>	<p>Gauge whether the worker is overworked.</p> <p>Is there enough time (depending on commute time) for her to do things outside of work?</p>	<p>Bulk of Questions</p> <p>Types of Questions: Indirect</p> <p>Formulation: Level of Detail and Building the Conversation</p>
<p>For Men Workers</p> <p>11 What does your day look like? At what time do you wake up? Do you have time to eat breakfast?</p> <p>12 Do you take the bus to go to work or are you able to walk? How long does it take you to get to work?</p> <p>13 At what time do you have to clock in?</p> <p>14 At what time do you normally finish your work day?</p> <p>15 When do you get home? Do you normally have time to stop somewhere on the way home (visit friends) or is it too late?</p>	<p>Gauge whether the worker is overworked.</p> <p>Is there enough time (depending on commute time) for him to do things outside of work.</p>	<p>Bulk of Questions</p> <p>Types of Questions: Indirect</p> <p>Formulation: Level of Detail and Building the Conversation</p>

2.4

Working Hours: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>16 What does your lunch break look like? (Do you have time to eat?)</p> <p>17 How regular is overtime? Who is working overtime? Is it true that some workers feel that they must accept longer hours? Why is that? Do workers regularly show up for overtime on Saturdays? What about Sundays? And night shifts?</p> <p>18 Would you say that workers sometimes stay longer to hit their objective? Why is that?</p> <p>19 What happens if you have a funeral or need to go to the doctor? Is that frowned upon by management? How about co-workers?</p>	<p>Probe regularity of overtime, process of distribution of hours, whether it is voluntary or a necessity for some workers.</p> <p>Gauge whether targets are realistic.</p> <p>Assess how special leave is dealt with.</p>	<p>Delve Deeper</p> <p>Type of Question: Open-Ended</p>
<p>20 Would you say that workers feel like they are able to do things outside of work on a work day?</p> <p>21 What do you do in your free time?</p>	<p>Validation and ease out of topic</p>	<p>Conclusions</p> <p>Ease out of the questions with lighter questions</p>





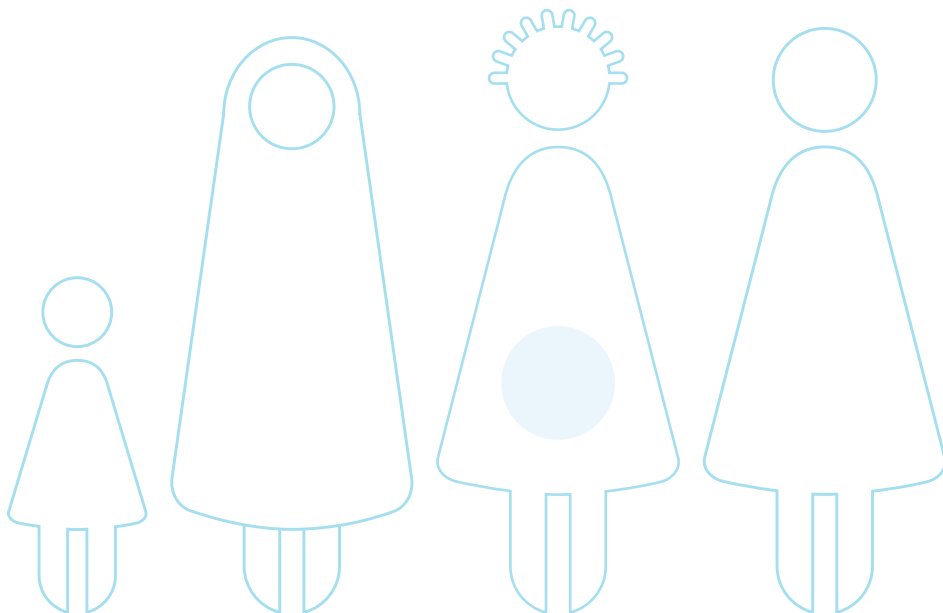
Example of Gender Lens Integration

Social & Labour Convergence Project Assessment Tool | Working Hours

The **Social & Labor Convergence Project (SLCP)** aims to bring together unique perspectives to create an efficient, scalable, and sustainable solution for social audits. It aims to become the first industry-wide framework to assess social and labour conditions. This framework includes a standard-agnostic tool and verification methodology that collects objective social and labour data that stakeholders can use to identify opportunities for improvement and track progress.

The SLCP has integrated key gender-specific questions and checkpoints into its new assessment tool as shown below:

Sub-section	Category	Number	Question	Response
Working Hours	Voluntary overtime	WH-15	Is overtime voluntary? (Select all that apply)	<ul style="list-style-type: none"> ■ Employees are able to refuse working overtime due to sickness ■ Employees are able to refuse working overtime due to family emergency ■ Employees are able to refuse overtime for parental responsibilities (i.e., breastfeeding and childcare) ■ Employees are able to refuse overtime for any reason ■ Other- employees are able to refuse overtime in other circumstances ■ Employees must conduct overtime as requested regardless of reason



2.5 Harassment and Abuse

Sexual harassment is an everyday experience for many female workers, who endure abusive behaviours including offensive and sexually explicit language, hearing suggestions to become prostitutes, and physical acts such as patting, hitting, and slapping. Many female workers have also experienced unwanted sexual advances and intimate partner violence in their communities. Sexual harassment is closely linked to other problems women face in the workplace.

Because they occupy a majority of precarious jobs such as short-term contract positions, and because they are more likely to be in junior positions and/or on probation, women workers are more likely to be harassed. They are especially vulnerable to harassment when they fail to meet production targets, make a mistake, ask for leave, arrive late, or fall sick. They also face harassment when traveling to and from work.

Women also face adverse social norms. In this context, sexual harassment becomes an assertion of power and is used to intimidate, coerce, or degrade another worker. While it may be invisible to an auditor, this pervasive issue leaves women with an ever-present sense of vulnerability. However, women have to a certain extent normalized sexual harassment and unwelcome advances as a part of their lived experiences. A social stigma is attached to survivors, and workers often keep silent instead of risking their jobs and their reputations, damaging their marriage prospects, or upsetting their partners. In the context of social audits, sexual harassment—as an often-invisible and unreported issue—is particularly difficult to identify during worker interviews and site observation. The verification measures on the following pages will support the identification of these considerations.

Definition

The ILO* defines sexual harassment as a sex-based behaviour that is unwelcome and offensive to its recipient.

For sexual harassment to exist these two conditions must be present. Sexual harassment may take two forms:

- Quid Pro Quo, when a job benefit—such as a pay raise, a promotion, or even continued employment—is made conditional on the victim acceding to demands to engage in some form of sexual behaviour
- Hostile working environment in which the conduct creates conditions that are intimidating or humiliating for the victim



What Auditors Have Experienced

In rural Mozambique women are often frowned upon if they work, since their traditional role is to work at home tilling land or collecting water. When they do work, women are often harassed: for instance, they are attacked on pay day and their cash wages are stolen.

This issue was overcome when the employers began paying the women on random, non-disclosed days, so communities did not know when “pay day” was.



2.5.1 Verification Measures

Harassment and Abuse Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Check codes of conduct and policies for non-harassment and abuse clauses, and check whether they adequately address factors such as verbal, physical, sexual, and psychological violence. Check for the existence of the full definition of sexual harassment (ILO definition), and check whether it includes specific examples, such as unwelcome sexual advances; unwanted hugs and touches; suggestive or lewd remarks; requests for sexual favours; or the display of indecent, derogatory, or pornographic pictures, posters, drawings, or videos.
- Ensure that policies extend to transport to and from the workplace, health care facilities, and accommodation provision, including for on-site subcontractors (e.g. canteen, security).
- Verify existence of a grievance mechanism and ensure that it meets any existing local law and internationally-recognized best practice criteria (e.g. United Nations Guiding Principles on Business and Human Rights). Verify that it is confidential and unbiased, and specifically includes non-retaliation clauses (e.g. anonymity, offers of protection from retaliation where required).

Leading suppliers will:

- Focus on preventative measures and provide incentives for respectful behaviour. These may include regular awards for positive behaviour, such as the Dignity at Work scheme or Respectful Communicator Award.
- Extend policy to workers subject to intimate partner violence (e.g. health facility and social welfare organisations referrals, leave provision for survivors).

Embedding into Business

The following measures should be taken to verify the integration of gender within the business's processes:

Workplace Culture: Look out for any indicators of site culture or evidence of inappropriate materials or behaviour that could be intimidating, threatening, or degrading towards women. These could include lewd images/posters or public posting of names of workers facing disciplinary measures.

Organizational Structure: Check organization chart and hierarchy, including mapping the workflow of the production site, based on sex ratio per job categories, related responsibilities, and types of incentives to identify potential work abuses. Specifically look out for misalignment of incentives between supervisors and workers.

Specific Procedures: Check existence of hire-fire mechanisms (short-term hiring for less than three months) as possible signs that workers' pre-disposition to act desperately to gain or keep employment is abused.

Record any safeguards that are afforded to women on company-operated transports and in dormitories (these areas are included in the factory tour/site review).

Communication and Training: Check that policies and procedures are communicated, and that training is provided and understood across the organization. Training and dissemination of information should include the use of multiple mechanisms (such as posters, training workshops, handbooks, online learning, and on-site talks in a language understood by workers). Check that the scope of materials and training extends to transportation and accommodation where provided.

Monitor uptake of training on non-harassment practices for key groups including managers, supervisors, workers, and other on-site and transport service providers.

Embedding into Business (continued)

Grievance Mechanism: Capture how the grievance mechanism was designed and who can access it (e.g. on-site workers, business partners, community, on behalf of self or others).

Check whether the grievance mechanism is adequately resourced and who oversees and monitors it. Is it a senior responsible person? What skills and training do they have? Is the grievance mechanism body that processes complaints gender-balanced?

Subcontractors: Review contracts and job descriptions of security guards and medical professionals to identify any clauses that may induce harassment or unnecessarily harsh discipline.

Where security checks take place on the workplace site or at staff hostels, do these take place respectfully and without intimidation (to the workers or their dependents)? Are the security guards performing “pat-downs” or searches on women workers of the same gender?

Leading suppliers will:

Organize gender-balanced grievance committees and include management and worker representatives to process harassment and abuse concerns more equitably.

Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impact on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks to:
 - Collate statistics on grievances raised through on-site mechanisms. (What are the common grievances raised? By men or women? Have they been acted on? Are these types of issues in line with country/industry benchmarks?)
 - Check if records cover the necessary detail, highlighting the types and severity of harassment but also the timeframe between when the grievance was raised and when corrective action was taken.
 - Cross-reference timing of grievance issues with any subsequent termination/resignation occurrences to spot potential retaliation.
- Measures of worker impact and empowerment (assessing women’s awareness and agency, workplace practices impacting women) through interviews:
 - Include union workers or worker representatives in the list of “key personnel” during document review and include them in worker interviews where possible.
 - Do women feel safe at work? Check if there are any behaviours that make women feel uncomfortable, including if women understand the meaning of sexual harassment.
 - Do workers feel intimidated by their supervisors (especially for piece-rate workers and those with production targets)?
 - Where applicable, do workers feel intimidated during security checks (including through undue physical contact)?
 - Have workers (including union workers) received adequate training on sexual harassment and mechanisms available to them to raise grievances?
 - Do workers feel that the facility has adequate mechanisms (confidential and unbiased) in place to protect them from harassment or abuse? Do workers know how to access them? Do they feel protected from retaliation in the event of raising a grievance?
 - Where grievances have been raised, do workers feel that follow-up action has been taken as a result?
 - Do union workers know how to respond if a worker raises issues with them directly?

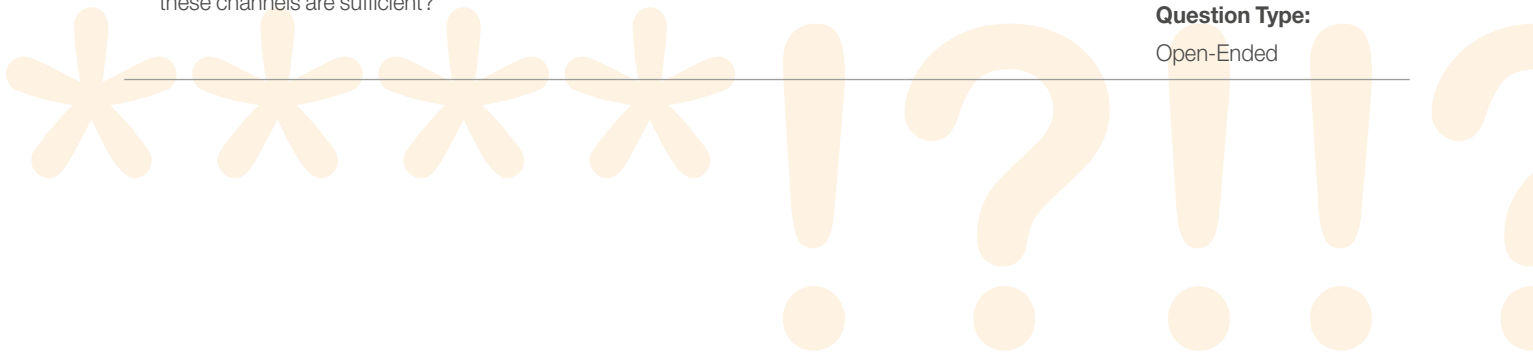


2.5.2 Sample Worker Interview Scenario

Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on harassment and abuse and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Harassment and Abuse: example of worker interview scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 In the community where you live, is it common or acceptable for women to voice their opinion at home?</p> <p>2 Who usually makes decisions in the community and at home? Are women allowed to participate? What usually happens to women when they express different opinions to men? Do they get shouted at? Do men sometimes raise a hand on women? Is it acceptable?</p>	Get a sense of how much is acceptable for women regarding verbal, emotional, and physical abuse	<p>Building Rapport</p> <p>Question Type: Indirect</p> <p>Formulation: Deliberate Loading</p>
<p>3 I heard shouting is common. Would you say it happens often? Is it often from men to men? Does it happen from men to women? Does it ever happen from women to men?</p> <p>4 In the workplace, would you say workers are friendly with each other? How?</p> <p>5 When workers do not get along, how do they express themselves? Do they have a verbal argument? Do they raise their voices? Does it get physical?</p> <p>6 What about in transportation to and from work or at security checks? Would you say security staff (where relevant) are respectful with workers? How about in dormitories or staff hostels?</p>	Get a sense of verbal and physical abuse amongst workers. Is it an acceptable behaviour amongst peers?	<p>Bulk of Questions: Abuse</p> <p>Question Type: Indirect</p>
<p>7 Do workers get along with their supervisors? What about with management?</p> <p>8 Do supervisors get along with each other? When they don't get along, how do they act?</p> <p>9 What about when supervisors don't get along with workers—what do they do?</p>	Get a sense of verbal and physical abuse amongst workers. Is it an acceptable behaviour amongst peers?	<p>Delve Deeper – Abuse</p> <p>Question Type: Indirect</p>
<p>10 Do you feel like when something happens that makes a woman feel bad (such as shouting), workers can seek comfort somewhere (co-workers, counselling, home)?</p> <p>11 Are you satisfied with these channels? How do they work? Do you think these channels are sufficient?</p>	Do women have channels or people they can go to in order to deal with the issue? Are these effective?	<p>Conclusions</p> <p>Ease out of the questions with lighter questions</p> <p>Question Type: Open-Ended</p>





Sexual Harassment in the Garment Industry— Identifying Cues

Factors to consider in assessing the likelihood of sexual harassment are the “propensity” to sexually harass and the “opportunity” to do so. This can be linked to factories’ operational structure and power relationships, their methods of guaranteeing employment, and their methods of determining pay.

- Sexual harassment is most likely to occur when it is unacknowledged by factory management and where workers are denied the opportunity or do not have the agency to express their concerns.
- Supervisors without training are more likely to revert to verbal or physical abuse to manage workers and elicit effort on their line, and evidence shows this could extend to sexual harassment.
- Workers who have a daily production target are 50 percent more likely to report concerns with sexual harassment, even more so when their supervisors are paid a fixed salary and have the power to certify that workers have met their target.
- Workers who are isolated or have constrained ability to move freely, such as migrant workers or workers who have no access to technology, are more likely to express concern with sexual harassment.

Source: <https://betterwork.org/blog/portfolio/garment-factory-characteristics-and-workplace-sexual-harassment/>



Example of Gender Lens Integration

Sustainable Agriculture Network (SAN): Additional Social Auditing Methods for Sexual and Psychological Violence against Women

CRITICAL	CRITERION 4.2
<p>Workers are treated respectfully and are never subjected to threats, intimidation, sexual abuse or harassment, or verbal, physical or psychological mistreatment.</p>	
<p>Objective</p>	<p>Protect all workers’ physical and psychological integrity.</p>
<p>General Guidance</p>	<ul style="list-style-type: none"> • Applies to any type of operation and any type of worker. • Farms map and analyze the workflows for each production site to identify jobs and corresponding responsibility with possible focal points of abuse. • Farms publish and communicate to all employees and workers clear decisions about: <ul style="list-style-type: none"> – Organizational policy on an abuse free work place; – Sanctions and corrective actions; – Policy for the empowerment of women in different levels of the organization, including equal opportunities when appointing lower and upper management positions. • Farms establish mechanism to address vulnerable people issues: Mechanisms may include (but are not limited to): <ul style="list-style-type: none"> – well-trained and functional gender committee: to address any complaints regarding abuse and harassment; – frequent training for all workers, targeted particularly at staff that plays a specific role in the complaints procedure; – sexual harassment complaints procedures are monitored and evaluated periodically. • Use of any form of, or threat of, monetary fines and penalties as a means to maintain labor discipline is prohibited, including for poor performance or for violating company rules, regulations, and policies. <ul style="list-style-type: none"> – This includes the fact to prohibit the use or access to food, water, toilets, canteens, medical care or health clinics. – It also covers the non-use of physical violence, including slaps, pushes or any other forms of physical contact as a means to maintain labor discipline and the no use of any form of verbal violence, including screaming, yelling, or the use of threatening, demeaning, or insulting language.

In 2017, SAN developed guidance on additional social auditing methods for sexual and psychological violence against women for individual tea farms—and for groups of farms that operated as one single organisation—for high-risk countries (Burundi, Ethiopia, Kenya, Malawi, Mozambique, Rwanda, Tanzania, Uganda, Zimbabwe), where these issues have been reported as pervasive and predominant.

Source: www.rainforest-alliance.org/business/sas/wp-content/uploads/2017/11/14_sexual-harassment_en.pdf



 Case Study

2.5

Enabling and Protective Factors of Workplace Sexual Harassment in Agriculture — Yakima Valley, Washington

Workplace sexual harassment of women agricultural workers has become an increasing concern in the U.S. Women agricultural workers are largely low-income and Latina, and work in predominately male environments, increasing the risk of sexual harassment. A qualitative study using focus groups of women agricultural workers highlighted some of the personal and work environment-related risk and protective factors that perpetuate or prevent workplace sexual harassment.

Enabling Factors

- **Lack of economic security, English literacy, and legal documentation.** Most workers depended on the foreman's bilingual language skills to communicate and keep their jobs, leaving them vulnerable to sexual harassment.
- **Power imbalance.** The foremen had the power to hire or fire the workers, and even threatened and undermined the workers' credibility by stating that no one would believe them even if they filed a complaint. In some cases, the foremen were related to the growers and owners, and this made it more challenging for women workers to stop the harassment.
- **Physical isolation.** This was particularly a concern in the fields because the foremen often separated women workers from their husbands and co-workers, leaving them alone in isolated areas.
- **Lack of cohesion.** The lack of cohesion and support among female workers discouraged women from reporting the harassment. Women also described how being sexually harassed was an emotionally and socially isolating experience. Female co-workers often reacted unfavourably towards harassed women. They blamed the woman for provoking the men, especially if the woman was single. They gossiped and started rumors. Women workers were sensitive to how their female co-workers perceived them.

Protective Factors

- **Identities.** In two cases, women who were single or heterosexual pretended to be married or a transvestite, respectively. They felt that this prevented male co-workers and foremen from harassing them.
- **Education on workers' rights.** Several women advocated for disclosure and encouraged other participants to speak up about the issue. They discussed strategies for reporting workplace sexual harassment to the authorities, such as bypassing the foreman and reporting directly to growers and owners. They saw themselves as agents for change.
- **Workplace trainings and policies.** A few women also described supportive foremen, who were more responsive to complaints after receiving training.

Source: https://digital.lib.washington.edu/researchworks/bitstream/handle/1773/27163/Kim_washington_02500_13202.pdf?sequence=1



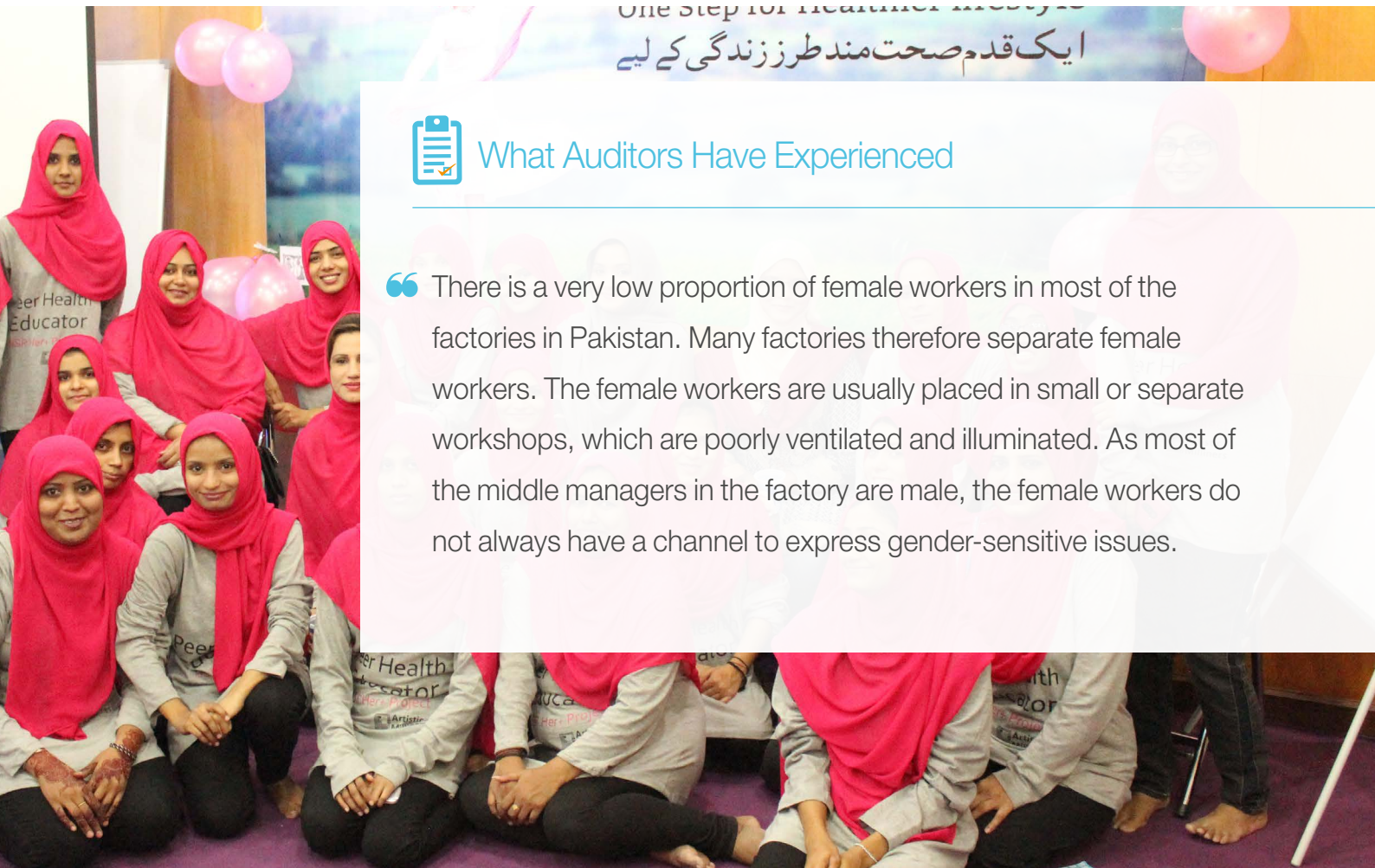
2.6 Health and Safety

Job and task segregation by gender means that women and men are generally exposed to different work-related hazards. In addition, specific vulnerabilities related to the female reproductive system—especially during pregnancy and breastfeeding and including the types of work and substances women are exposed to—are of crucial importance.

Beyond occupational safety and workplace roles, it is important to understand how the physiological and social differences between women and men have disproportionate impacts on women workers and the work life. Women must typically juggle the need to work long hours to make a decent salary with their domestic responsibilities as caregivers, parents, and providers within their families.

This often leads to fatigue, stress, and disengagement at work, such as decreased participation in workplace health and safety trainings or professional advancement programs. It also means that women have less time than men outside of work to deal with health issues. Women have specific health needs and issues, including sexual and reproductive health, that are different from those faced by men. The more a workplace recognizes these differences and addresses them, the more equitable the situation is for women workers. When small health issues are not resolved, they lead to more serious conditions that cause absenteeism and turnover.

Access to health or other facilities, on site and in the community, can have a disproportionate impact on women (health services, toilets, childcare facilities, nursing rooms). This is a cross-cutting issue in codes of conduct, most commonly addressed in the Occupational Health and Safety section. The verification measures on the following pages are designed to promote a deeper understanding of the role that health plays in women's lives, and to support the identification of important workplace considerations. Auditor should interview doctors, nurses, and other health staff as part of the audit where relevant.



What Auditors Have Experienced

- “ There is a very low proportion of female workers in most of the factories in Pakistan. Many factories therefore separate female workers. The female workers are usually placed in small or separate workshops, which are poorly ventilated and illuminated. As most of the middle managers in the factory are male, the female workers do not always have a channel to express gender-sensitive issues.



2.6.1 Verification Measures

Health and Safety

Verification Measures

2.6

2.6.1 Health and Safety | Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Check that policies provide a framework that accommodates the needs and protects the health of women, including policies that:
 - Take appropriate steps to ensure reproductive health and protect pregnant women from hazardous substances and occupational accidents
 - Establish the right to rest, drink, take toilet breaks, or see healthcare staff when needed, with a specific focus on pregnant and breastfeeding women
 - Ensure workers have access to health services outside of the workplace for non-emergency health care
- Check that the workplace provides health insurance to all eligible workers as required by law.
- Check that workplace policies give women and men workers the right to request flexible working arrangements to accommodate health and well-being issues. If so, check whether there are restrictions on these arrangements.
- Check policies to ensure that there is no denial of sick leave (auditor should note where such denial is related to pregnancy or childcare responsibilities).
- Check that the workplace has a process for disseminating and displaying important health messages for workers, in a language and a format that workers (including migrant workers) can understand.
- Check that the workplace has policies or management systems to ensure that its infirmaries meet basic standards of cleanliness, confidentiality, and quality of care.
- Check that workplace data systems incorporate health information that is disaggregated by gender and that includes workplace infirmary or health function data beyond workplace injuries and exposures.

Leading companies will:

- Advance more expansive policies on workplace health that encompass broader notions of worker well-being and health promotion, and that seek greater alignment between OHS standards for workplaces and internationally-recognized health rights that address specific-gender issues.
- Communicate senior-level commitment to worker wellbeing policies and programs

Embedding into Business

The following measures should be taken to verify the integration of gender within the business's processes:

- Check that the site has a manager responsible for health and safety. Does the manager's remit cover broader worker well-being and health promotion practices? What authority does she or he have to implement changes? How often does the manager meet with the infirmary staff?
- Check that the site conducts Health & Safety Risk Assessments and that this covers gender-specific provisions such as for sexual and reproductive health.
- Check the training provided: Does it extend beyond OHS? To whom is it offered and are training records up to date? Does it cover potential risks of hazardous materials, including to reproductive health?
- Check that any on-site healthcare facilities meet minimum basic public health standards for cleanliness, confidentiality, privacy, health information, quality and non-expired medicines, and referral (based on the "accessible, available, acceptable, and of quality" AAAQ framework).

Health and Safety

Verification Measures

Embedding into Business (Continued)

- Check that the health facility collects gender-disaggregated data on the types of service and information it provides to both women and men workers. Conduct an analysis to identify trends and possible differentiated worker health needs.
- Check that workers have access to healthcare insurance that meets their specific needs. Is it provided as a workplace benefit?
- Assess what products and information the clinic has to address menstrual hygiene and women's health needs.
- Check whether there are clean and hygienic toilets, within reasonable distance of the workplace, separated by gender and meeting legal requirements?
- Check whether there are healthcare professionals on site. What level of qualification do they have? Do they have clear job descriptions defining areas of authority and responsibility?
- Check whether the law requires flexible working arrangements to be offered to women and men workers on request. Does the site accommodate circumstances such as pregnancy or nursing?
- Check whether the workplace makes all allowances for pregnant or nursing mothers in line with the law, e.g. rest and breaks, medical appointments, nursing breaks, and a suitable private quiet space. (Check that any childcare facilities are legal and meet any local laws/regulations. Where external childcare services are provided, verify evidence that it meets local laws/regulations.)

Leading companies will:

- Ensure systems and processes are established to embed worker well-being and gender-specific health and safety requirements into business operations and demonstrate senior leadership commitment.
- Hold managers accountable for meeting health and safety requirements, including the right to sexual and reproductive health and access to breastfeeding or childcare facilities regardless of legal requirements.
- Integrate worker well-being and health promotion into OHS training programmes to address comprehensively workers' needs for general health, specifically including issues such as sexual and reproductive health; family planning support; and promotion of well-being, including physical, mental, financial, and social well-being.

Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impact on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks to:
 - Check for any correlation in absenteeism of women workers with health-related issues (for instance, what is the number of absentees related to menstruation as a percentage of total absenteeism?).
 - Check termination/resignation records of former female employees for trends—especially if linked to menstrual health, pregnancy, or breastfeeding issues.
 - Check for unauthorized deductions (e.g. for sick leave, medical appointments). This is particularly important for vulnerable workers such as piece-rate workers, who may be unable to recoup costs of sick leave linked to themselves or their dependents.

Health and Safety

Verification Measures

Worker Impact and Gender Norms (Continued)

- Gauge worker impact and empowerment (assessing women's awareness and agency, workplace practices impacting women) through interviews:
 - Do workers feel that their health and well-being needs are adequately addressed at work?
 - Are workers aware of available healthcare facilities on site? Are they aware of their health rights?
 - Do women have access to and use of modern family planning products?
 - Are female workers aware of good menstrual hygiene methods and do they have access to feminine hygiene products at work?
 - Do female and male workers have easy access to a doctor/nurse/on-site clinic or external health provider that can meet all their health and well-being needs (including OHS, sexual and reproductive health, and general well-being)?
 - Are on-site healthcare professionals able to address broader health concerns of women and men workers and refer to quality off-site services where needed?
 - Do workers feel comfortable accessing on-site healthcare facilities whenever they need to?
 - Do workers feel they are treated with respect by healthcare staff?
 - Are workers aware of, and informed of, any risks to reproductive health and any programmes to prevent exposure to hazardous substances? Do they know of appropriate accommodations for any special conditions?
 - Are workers aware of any harassment or disciplinary action related to leave during working hours for toilet breaks or healthcare needs?
 - Have workers been absent from work because of menstruation or other reproductive health issues?
 - Do women feel comfortable seeking medical attention during or post pregnancy?
Check e.g. the level (percentage) of uptake of benefits for eligible employees.
 - Do workers feel comfortable requesting access to flexible working arrangements?
 - Do workers feel that the childcare arrangements meet their needs?
 - Does the workplace offer additional committees where relevant that specifically address women's needs (e.g. health and safety related to women's reproductive health, sexual harassment)?

Leading companies will:

- Integrate women's health topics more comprehensively into workplace assessments.
- Respond to the assessment by engaging with workers and identifying and implementing responsive health policies, practices, programmes, or services.
- For a more detailed worker questionnaire see the [Employee Survey \(Appendix 1\) in the UL/BSR paper on Incorporating Women's Health into Workplace Assessments](#).

Source: www.bsr.org/reports/BSR_UL_Incorporating_Womens_Health_Workplace_Assessments.pdf



2.6.2 Sample Worker Interview Scenario

2.6

Worker interviews are key to corroborating and/or uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on health and safety and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Health and Safety: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 When you are at home, are you able to do all of the basic washing up? Wash the dishes, wash your hands, take showers?</p> <p>2 What about when you need to go to the toilet? Would you say there is a private and clean area? Or is it far away? Not accessible?</p>	<p>Gauge access to hygiene at home/ in the community</p>	<p>Building Rapport</p> <p>Type of questions: Open-Ended and Indirect</p>
<p>3 How would you say your assessment of the toilet in the workplace compares to how you described the facilities in your home?</p> <p>4 When you head to your work station, do you feel like you have the necessary gear to perform your job? Where do you get your gear?</p> <p>5 Is there a clinic?</p>	<p>Are workers able to use the toilet facilities in the condition they're in (at least in comparison with home)?</p> <p>Are workers able to pick up their protective gear? Are there any favours asked in exchange for protective gear?</p> <p>Establish the health infrastructure available to workers in the workplace (such as a clinic).</p>	<p>Bulk of questions</p> <p>Type of questions: Indirect</p>
<p>6 Are you able to use the toilets? If not, what keeps you from using them? Is there a special path/route you use to get to them? Is there another way to get to them? If so, why don't you use that route?</p> <p>7 Would you say everyone can use them? Or a select few? How come?</p> <p>8 On the way to the toilets/locker room, are there any challenges? What are they? Elaborate.</p> <p>9 On your way to pick up PPEs, do you have to do go through any obstacle? Who do you get them from? How is the process set up for you to pick them up?</p> <p>10 How do you get to the clinic (if there's one)? Are you able to get to the clinic easily? Is there any reason you would refrain from going to the clinic?</p>	<p>How do workers get to the toilets/lockers/ clinic? Are there paths that are blocked? If so, what blocks them?</p> <p>Is there favouritism amongst workers to be able to use the toilets/ locker rooms?</p>	<p>Level of Detail</p> <p>Question Type: Indirect and Open-Ended</p>



Case Study

BSR | HERproject

Insights from BSR's HERproject

Ethiopia

In a flower farm in Ethiopia, it was found that women were deliberately not using the bathroom. They were choosing not to drink or to go outside rather than using the appropriate stalls. Research uncovered that women were doing this because male workers would gather round a bathroom and make sexual remarks to women using the toilet. As a result, women looked for options outside of the dedicated areas, and such options were often unsanitary.

India

Similarly, research in a garment factory in India showed that women were putting their own health and safety at risk to refrain from using the toilets. In this case, women were purposefully not drinking so that they would not have to use the toilets, because the toilets were unclean and/or unsafe (and were often clogged from improper disposal of waste).



2.7 Freedom of Association and Collective Bargaining

There are several gender considerations that should be taken into account when assessing whether freedom of association and collective bargaining mechanisms are gender sensitive.

First, women may not be reached by their workplace representatives (because of the types of job they occupy and a lack of knowledge of their own rights), and committees/unions may not take appropriate measures to integrate, include, and represent women and their specific needs. Secondly, cultural norms may limit women's ability and desire to voice concerns and to attend meetings. These meetings may be organised in locations and at times that conflict with women's additional duties, such as unpaid care work. Thirdly, for women's needs and priorities to be adequately addressed by trade unions, women must be properly represented in the trade union structure and committee, including in leadership positions. This is rarely the case today.

Lastly, the fear of retaliation based on their gender may deter women from participating in workplace committees or unions, and from using grievance mechanisms adequately. In addition, according to the latest Bangladesh Shramra Institute study, *Barriers to Women's Participation in Trade Unions and Labour Organisations*, female workers in 17 registered Bangladeshi trade unions told researchers that they had been sexually harassed by union leaders, a fact which further deters women from joining unions.³¹

The below verification measures support the identification of these types of issues.



2.7.1 Verification Measures

Freedom of Association and Collective Bargaining

Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Check whether there are any guidelines to ensure that committee membership and worker representative roles are equally available to men and women.
- Check for evidence of senior commitment to driving engagement of women workers on general workplace issues (including more gender-specific issues).

Leading suppliers will:

- Allow and encourage representatives from a range of workers (women and men, and including temporary, agency, and homeworking staff) to stand for election for trade unions or worker committee representative roles.
- Work collaboratively with peer organizations to improve social dialogue within their region/sector, including on gender-specific challenges.

**Embedding
into Business**

The following measures should be taken to verify the integration of gender within the business's processes:

- Check what types of unions, committees, or associations are available on-site.
- Check whether, in the absence of a union, the site trains all workers on the importance of a freely-elected worker committee.
- Record whether the worker representatives are volunteers and the process by which they are elected.
- Check whether membership and worker representative roles are equally available to men and women.
- Check the records of union/committee meetings to see whether meetings are held at times or in locations that would make it difficult for women to participate (either because of safety concerns related to out-of-hours travel or because of family responsibilities).
- In instances where trade union leadership/representatives are male and receive gender-specific grievances, assess whether and how these are fairly and effectively processed.
- Check what additional channels are available for management to collect worker voices—and whether these channels are used by women.

**Worker Impact and
Gender Norms**

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impact on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks to:
 - Record both union/worker committee leadership or representative roles and membership by gender. Record the numbers and compare as a percentage of the workforce by gender and category of workforce (temporary, casual, part-time, etc.).
 - Check any instances of gender-specific grievances raised and follow-up actions taken.
 - Review and record number of women actively participating in union/committee meetings.
 - Review meeting minutes to see whether any women's issues are discussed.
 - Review and record any clauses within collective bargaining agreements that are gender-specific/women-friendly.
- Measures of worker impact and empowerment (assessing women's awareness and agency, workplace practices impacting women) through interviews:
 - Do workers feel that management is encouraging workers to express their views on workplace issues using different channels? Do they trust these channels?
 - Are workers aware of, and informed of, their rights and do they know who their union/worker representative is? Do they know what sorts of issues can be raised?
 - Do women feel confident enough to consider putting themselves up for election (benchmark against men)?
 - Do women feel confident enough to speak out to union/worker representatives about the issues they face in the workplace?
 - Do women feel that their views are represented within the union/worker committee?
 - Are women able to participate in union/committee meetings (consider location, timing)?
 - Are gender-specific concerns reflected in any negotiated local workplace agreements?



2.7.2 Sample Worker Interview Scenario

2.7

Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on freedom of association and collective bargaining, and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Freedom of Association and Collective Bargaining: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 Would you say that women are able to participate in community gatherings?</p> <p>2 Are women equally represented in community dialogues? Are there as many women as men?</p> <p>3 To what extent can women raise a point/issue? Is there a specific order that needs to be respected for women to get to speak?</p>	<p>What are the cultural gender norms for women participating in community dialogues?</p>	<p>Build Rapport</p> <p>Deliberate Loading</p>
<p>4 At work, who do you go to when there is an issue?</p> <p>5 Are there groups or committees that have been created to represent your (workers') best interests? What are they?</p> <p>6 Do you know who are the current worker representatives?</p> <p>7 Do you know how many women (in comparison to men) are worker representatives? How many?</p> <p>8 Would you say that the voice of women workers is effectively heard? How come or why not?</p>	<p>Are there union/ worker groups and committees in the workplace?</p> <p>How informed are workers?</p> <p>Is there a relatively gender-balanced committee representation?</p>	<p>Bulk of Questions</p>
<p>9 Are there ways for you to participate in these groups?</p> <p>10 How do you become a worker representative? Would you want to become one yourself? If not, why not?</p> <p>11 I heard some workers could not get involved. What do you have to do to get involved? Who do you have to talk to?</p> <p>12 What's the process to raise an issue? How is the issue resolved? Do you trust the process? And what is the time frame?</p>	<p>Are worker committees inclusive?</p> <p>Are there any favour exchanges that need to take place for a worker to participate or to raise an issue?</p>	<p>Delve Deeper</p> <p>Question Type: Open-Ended and Indirect</p> <p>Formulation: Deliberate Loading</p>



Example of Gender Lens Integration

Gender-Sensitive Collective Bargaining Agreements

National Collective Bargaining Agreements

- CBA clauses on gender-based violence in Australia
- CBA in textile sector in Jordan
- CBA between UFEA and UHAWU/NUPAWU in cut flower sector
- Ghana SSSS job evaluation system in the public sector
- Uruguay Domestic Workers Agreement
- PSI Peru Water Board job evaluation system

Global Framework Agreements

- Carrefour/UNI GFA on equality
- Chiquita and Colsiba/IUF GFA on sexual harassment
- GDF-Suez/EPUSU GFA on gender equality
- Inditex / IndustriALL GFA in garment sector

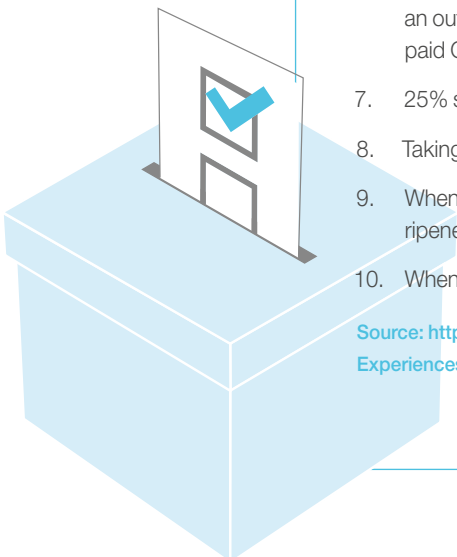
Source: Presentation by Jane Pillinger: *“Why Gender Matters! International Labour Standards, Collective Bargaining and Gender Equality”*

Case Study: Gender Equality Clauses in Collective Agreements

In 2004, women workers from Latin American banana plantations set up the Platform for Industrial Action for Women in the Latin American Banana Sector (PRMB). This Platform provides a regional agenda for women workers to support their various collective bargaining negotiations at a local level, with the aim of integrating gender considerations within these collective agreements. Below are specific clauses that were negotiated over a number of years with the DEL MONTE COMPANY (Trading as BANDEGUA) by the Izabal banana plantation workers’ union (SITRABI) in Guatemala.

1. An equity approach in the collective agreement (consultation of women workers).
2. Two hours’ breastfeeding for women who have given birth to twins or triplets.
3. An additional week’s pay over and above the legal entitlement for women who give birth by Caesarean section.
4. A meal for International Women’s Day.
5. When women are sacked during their probationary period because they have found the work physically difficult, they will have the chance to be re-hired.
6. Payment for washing the canvas aprons the women use in their work. The company used to pay an outside contractor Q 50.00 (US\$6.50) for each apron to be washed but now each worker is paid Q 2.58 (US\$0.34) to wash her own apron.
7. 25% salary adjustment in cases of maternity, common illness or accident.
8. Taking unpaid leave due to a child being sick will not affect their attendance record.
9. Whenever there are production shutdowns, the women will work calibrating fruit and testing it for ripeness.
10. Whenever the packing department is hiring, preference will be given to women applicants.

Source: http://www.bananalink.org.uk/sites/default/files/COLSIBA%20Collective%20Bargaining_ Experiences%20and%20Strategy%202016.pdf





Case Study

The Tamil Nadu Textile and Common Labourers Union (TTCU)

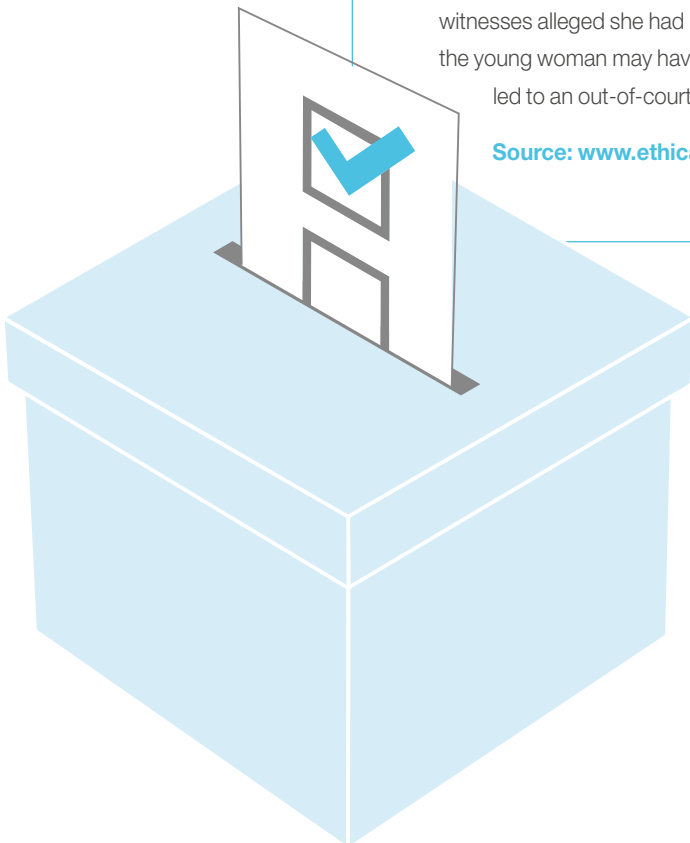
In 2010, an Indian Community group, Serene Secular Social Service Society, started a community outreach project in the Dindigal District of Tamil Nadu. With the help of the Association for Women's Rights in Development (AWID), 53 members formed a village women's committee initially focused on ending child labour amongst young girls. After rapid expansion, these committees began to focus on formal employment-related discussions, as the majority of members were found to be in low-paid work (80 percent were textile laborers).

In 2013, the organization became the Tamil Nadu Textile and Common Labourers Union (TTCU)—a trade union designed to address the specific concerns of women workers in textile and other industries. TTCU is “formed on the backdrop of innumerable working-class women having been subjected to abuse, exploitation, marginalization, and discrimination.”

TTCU has successfully acted in the following cases:

- A series of fatal mini-bus accidents transporting workers to and from local mills resulted in an intervention with the mills' owner. After extended negotiations, the owner invested in nine new mini-buses. Previously outsourced, the drivers are also now employees and are trained to acceptable standards.
- An older woman worker, allegedly forced to do overtime on unfamiliar machinery, suffered an accident that resulted in four severed fingers. The TTCU helped her secure a one-off compensation payment and the pension to which she was entitled.
- A family employed by a local spinning mill was distraught when one of their daughters was found dead in a mill canteen. The initial mill report stated that the young worker had choked to death, but witnesses alleged she had been brutally beaten. Evidence gathered by the TTCU also indicated that the young woman may have been raped. Various interventions with the mill, plus legal representation, led to an out-of-court settlement for the bereaved family.

Source: www.ethicaltrade.org/blog/charting-rise-women-only-trade-union-in-india



2.8 Employment Relationship

Women in global supply chains who are less aware of their rights and more prone to unfair employment practices are concentrated in precarious work (usually temporary or casual types of jobs). Many issues that women face in the workplace are partly determined by the type of job they occupy.

Some employers use precarious work arrangements to evade obligations related to social security provision, pensions, maternity and family leave, overtime payments, and vacation and holidays, as well occupational health and safety. From the likelihood of sexual harassment and discrimination to pay and benefit provision, the type of employment will influence how women are treated in the workplace. If women are employed by a recruitment agency, they may be even more vulnerable to discriminatory practices and forced labour.

In addition, women who are over-represented in the informal sector worldwide are often homeworkers, with no access to any type of job security, benefits, or health and safety standards. Women homeworkers often bear most of the operating costs themselves, such as for electricity and equipment, parts, and maintenance. The below verification measures unpack these specificities.



2.8.1 Verification Measures

Employment Relationship

Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Check for the existence of policies on subcontracting and homeworking.
- Check that termination policies and practices, including contractual termination conditions, do not leave vulnerable workers open to discrimination. (See discrimination section on p.38.)
- Check for standard contract language with employment agencies that specifically gives the employer the power to audit agencies' practices and ensure that the agency provides equality of compensation and workplace standards for women and men workers.

Leading suppliers will:

- Actively seek to use ethical recruitment agencies and advocate for improved protection for migrant workers (see [Recruitment Advisor](#) platform).
- Actively promote opportunities for regular employment and career advancement to agencies, contract workers, and homeworkers.

Embedding into Business

The following measures should be taken to verify the integration of gender within the business's processes:

- Check for evidence of unauthorized subcontracting e.g. more products than worker capacity; part-finished goods delivery (review of order records).
- Check that all legally-required documentation is on site for directly and indirectly employed workers (agency and contract workers).
- Check that workers have signed their contracts (where relevant).
- Review systems in place for monitoring agency management systems and verifying third-party-employed worker terms and conditions of employment (including wage payment method).
- Check what type of worker voice mechanisms and training are accessible to all workers, including temporary and agency workers.
- Check what type of system is in place to monitor homeworkers' working conditions.

Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impact on women and gender norms, allowing for more in-depth root cause analysis:

- Trend analysis through document checks to:
 - Check discrepancies and any discrimination with regards to equality of compensation, benefits and workplace standards, and regularity of hours for different worker types (permanent, agency, temporary, and migrant worker). This check should be conducted through contract and pay slip review and by gender.
 - Check contracts specifically for recurring fixed term contracts that may be used to avoid permanent employee status. Look for gender discrimination practices such as fixed term contracting based on marital status or pregnancy grounds.
 - Check homeworker records, including checking wages and benefits in conformance with local law if applicable.
- Measures of worker impact and empowerment (assessing women's awareness and agency, workplace practices impacting women) through interviews:
 - Do workers feel that permanent and agency workers are treated equally in terms of compensation, workplace standards, and workplace treatment (include all worker types in sampling for interview selection)?
 - Have temporary workers' contracts been systematically renewed over the years?
 - Have women been offered temporary contracts when recruited? Based on what grounds?
 - Do workers have a sense that work is being externalised? If so, how often?
 - Are homeworkers (where interviewed) aware and informed of contract rights, pay, and benefits?



2.8.2 Sample Worker Interview Scenario

Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on employment relationship and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Employment Relationship: Sample of Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 Do you live around here? Where? Are you originally from there? Where were you before?</p>	Are workers originally from the area?	<p>Build Rapport</p> <p>Open-ended</p>
<p>2 Are there some workers who are not originally from here? Where do they live?</p>	Are there many workers who come from further out (maybe even abroad)?	<p>Context Setting</p> <p>Deliberate Loading</p>
<p>3 For how long have most workers worked in this factory? Is this quite common for the region?</p>	Are most workers long term employees or temporary ones, and is this aligned with the regional trend?	
<p>4 I heard that it is difficult to find a job in the region. Is there a lot of movement of workers between factories?</p>	Is there significant turnover and exchange of workforce between factories?	
<p>5 When did you last sign a contract? At the time of joining the facility or more recently?</p>	What types of contracts are in place at the facility level?	<p>Bulk of Questions</p> <p>Deliberate Loading</p>
<p>6 I have heard that not every worker is treated the same with regards to wages, working hours, and other benefits. How does this work here? Can everyone be promoted in the factory or is it dependant on the type of contract that you have?</p>	Do agency and contract workers benefit from equal opportunities and from the same training?	
<p>7 Would you say that all workers have access to the same training?</p>	Are some suppliers circumventing specific employment benefits?	
<p>8 It is quite common in this region that short-term contracts are frequently renewed. Is this the case for some of the workers here?</p>	Is sub-contracting or homeworking being used?	
<p>9 Workers work hard at times to deliver products on time for the client. Are all the goods that are produced by the facility manufactured on site?</p>		

Employment Relationship: Sample of Worker Interview Scenario

2.8

Questions	Possible Findings or Conclusions	Methodology and Structure
10 Do you get along with workers who aren't from the region or speak another language? Are you friends with some of them?	Finish off on a high level by seeing whether workers see each other on the same level or whether workers themselves discriminate against and isolate migrant workers.	Ease Out



Case Studies

Peru

A study by the Centro Peruano de Estudios Sociales (CEPES) and Water Witness International carried out in 2010 found that at the Camposol company—one of the largest Peruvian agro-industry exporters, producing asparagus, red peppers, avocado, and other food products—one plantation employs 12,000 mainly female workers, of whom just 500 are contracted as long-term permanent employees. Repeatedly extended short-term contracts allow the employer to suspend the worker at any time and to terminate the contract without notice. Workers feel that employer has all of the power. When workers dare to join a union or speak out about poor conditions, their contracts are suspended or not renewed.

Source: http://www.progressio.org.uk/sites/default/files/Drop-by-drop_Progressio_Sept-2010.pdf

India

A field study carried out in 2010 by Labour Behind the Label and War on Want in Gurgaon, India showed that the law is widely flouted in the female-dominated garment industry, which is increasingly controlled by labour contractors or agents. The study found that the overwhelming majority of workers were employed through three or four different labour contractors. Interviewed women were clear that employers had switched to using contract labour in order to avoid their responsibilities, as workers on a contract basis are not given their rights in terms of annual leave with wages, bonuses, etc. No worker is given the right to unionise. All the issues related to poor working conditions and high targets are under the control of a factory owner who is no longer the “official” employer. The actual employer is now the labour contractor, who has little, if any, control over workplace conditions and whom the workers very rarely see.

Source: <https://waronwant.org/sites/default/files/Taking%20Liberties.pdf>



Did You Know?

The following employment practices are often associated with precarious work:

- Direct hire on temporary labour contracts
- Hiring in labour via employment agencies or labour brokers
- Contracting out functions to other companies
- Personal labour contracts as bogus “self-employed” workers
- Abusive probationary periods
- Disguised employment training contracts
- On call/daily hire
- Illegal or involuntary part-time work
- Home work

Source: http://www.industrial-union.org/sites/default/files/migration/imf/RelatedFiles/07032015092779/WEB_spotlight_0107-2.pdf

2.9 Management Systems

Gender-sensitive management systems are essential to making gender equality in the workplace a reality and to achieving meaningful long-term change for women workers.

Procedures, trainings, grievance mechanisms, and record-keeping systems should be designed with a gender lens to ensure that gender-sensitive policies and commitments are effectively translated into the workplace. The systems in place should support the implementation of gender-sensitive policies and their effectiveness through regular monitoring of their impact (or absence of). Suppliers should review their policies and practices based on established feedback loop mechanisms.

Having clear accountability mechanisms for the implementation and effectiveness of management systems is crucial, as is the allocation of adequate resources to successfully set up the systems and review them based on worker feedback. Making sure systems in place are automatically collecting data disaggregated by gender is equally important if working conditions are to be improved and fine-tuned to address the specific needs and challenges women face in a specific workplace. The below verification measures support a better identification of these considerations.



2.9.1 Verification Measures

Management Systems

Verification Measures

Governance and Policy

The following measures should be taken to verify the integration of gender within the business's governance and policy:

- Check whether senior management has committed to and developed a strategy/plan to support and promote gender equality in the workplace.
- Check whether an accountable person has been identified to oversee the implementation and periodic review of commitments and policies.
- Check that the site has gender-sensitive policies in place (such as non-discrimination, anti-sexual harassment, equal pay for work of equal value, maternity and paternity leave policy, childcare benefits, etc.).

Embedding into Business

The following measures should be taken to verify the integration of gender within the business's processes:

- Check that there are adequate resources (people and budget) for gender-sensitive policy implementation and ongoing monitoring and measurement.
- Check that there is a process for communicating gender-sensitive policies and standards to all workers on site (whether directly or indirectly employed) and at time of recruitment, in their native language.
- Record the systems in place for training and awareness-raising on any gender equality rights, policies, and processes, including grievance mechanisms. Check how this applies to all workers (including those with low levels of literacy or whose native language is different from the language of the employment site) and suppliers/subcontractors. This should include process, frequency, and any measures of effectiveness (take up).
- Check whether policies, processes, and communication and training mechanisms are periodically reviewed and updated to improve effectiveness and incorporate workers' feedback.
- Check whether the site collects data disaggregated by gender and correlates it with other factors like ethnicity, disability, and migrant status that can increase discrimination.

Embedding into Business (Continued)

- Where grievance mechanisms exist, confirm the type of system (formal or informal, channels, response procedures), key criteria (legitimate, accessible, predictable, equitable, transparent, rights compatible, based on continuous learning, based on engagement and dialogue), and how it is managed (internally, independent third party, etc.).
- Where the grievance mechanism is internal, note whether the complaints processing body is gender balanced in its composition.
- Check what processes and timeframe the supplier has for documenting, reporting, and acting on feedback received or impacts identified through a grievance system (especially when gender-specific issues are being reported).
- Record formal channels for communication between employees and management, including unions and worker organisations such as worker committees or worker representatives. Note whether these capture reporting and handling of grievances.
- Where possible, attend trade union/committee meetings or training events to evaluate their effectiveness and impact.

Leading suppliers will:

Demonstrate evidence of senior commitment to driving gender equality. This could take the form of communication to engage the entire factory/farm, access to training, gender committees, or mechanisms to engage with women (in addition to existing worker committee or trade union forums), and appropriate allocation of resources to implement plans and empower workers (such as dedicated personnel for gender-related issues).

Worker Impact and Gender Norms

The following measures should be taken to verify how policies, practices, and workplace culture effectively translate into impact on women and gender norms:

- Trend analysis through document checks to:
 - Assess the effectiveness of policies and systems (including for grievance mechanisms), specifically quantitative measures (e.g. number of cases reported through formal grievance mechanism, number of cases addressed and closed, number of repetitive/re-occurring cases, worker turnover). Please note that a rise in grievance reporting may reflect more effective remedy channels and may not necessarily imply that more violations are taking place. Equally, the absence of reported grievances may not necessarily imply that no violations are occurring but rather that workers do not trust the effectiveness of the grievance mechanism in place and fear reporting the issues.



Worker Impact and Gender Norms (Continued)

- Analysis of data disaggregated by gender captured by systems information (where available), which may unearth root causes. Cross-reference sample records by gender to check for differences in a range of factors (non-exhaustive list below) to understand possible interlinkages between issues and likelihood of structural discrimination:
 - *Balance/split of total workforce (and by seniority level, category of jobs, and pay grade)*
 - *Age*
 - *Length of service*
 - *Staff turnover*
 - *Working hours (standard and overtime)*
 - *Wages and bonuses*
 - *Access to and uptake of benefits*
 - *Sick leave (related to self/dependents)*
 - *Absenteeism*
 - *Accident rates*
 - *Occupational health issues*
 - *Grievances raised (and types)*
 - *Gender of worker representatives*
- Measures of worker impact and empowerment (assessing women's awareness and agency, workplace practices impacting women) through interviews:
 - Are workers aware of the site's gender equality commitments?
 - What is women's general well-being and safety situation at work?
 - Have workers received communication and/or training on gender-related policies and practices (including new training if/when updates to policies and processes are made)? How was it delivered?
 - Do workers (including men) understand the gender-sensitive policies and how these are relevant to them?
 - Which channels are available to and preferred by workers for communicating issues and suggestions (worker voice tools, suggestion box, face to face, supervisor, etc.)? Are workers aware of these? Do they know how to use them and report issues?
 - Which issues have been raised and do workers feel that these issues were satisfactorily addressed in a timely manner?
 - Is training provided to teams/committee members who manage grievances? Do they feel sufficiently equipped to address gender-specific issues?
 - Do workers have access to a system for confidentially reporting and impartially dealing with issues without fear of reprisal?
 - Do workers provide feedback on gender-sensitive policies and procedures? Do workers feel that management is acting on this feedback by regularly improving the policies and procedures?



2.9.2 Sample Worker Interview Scenario

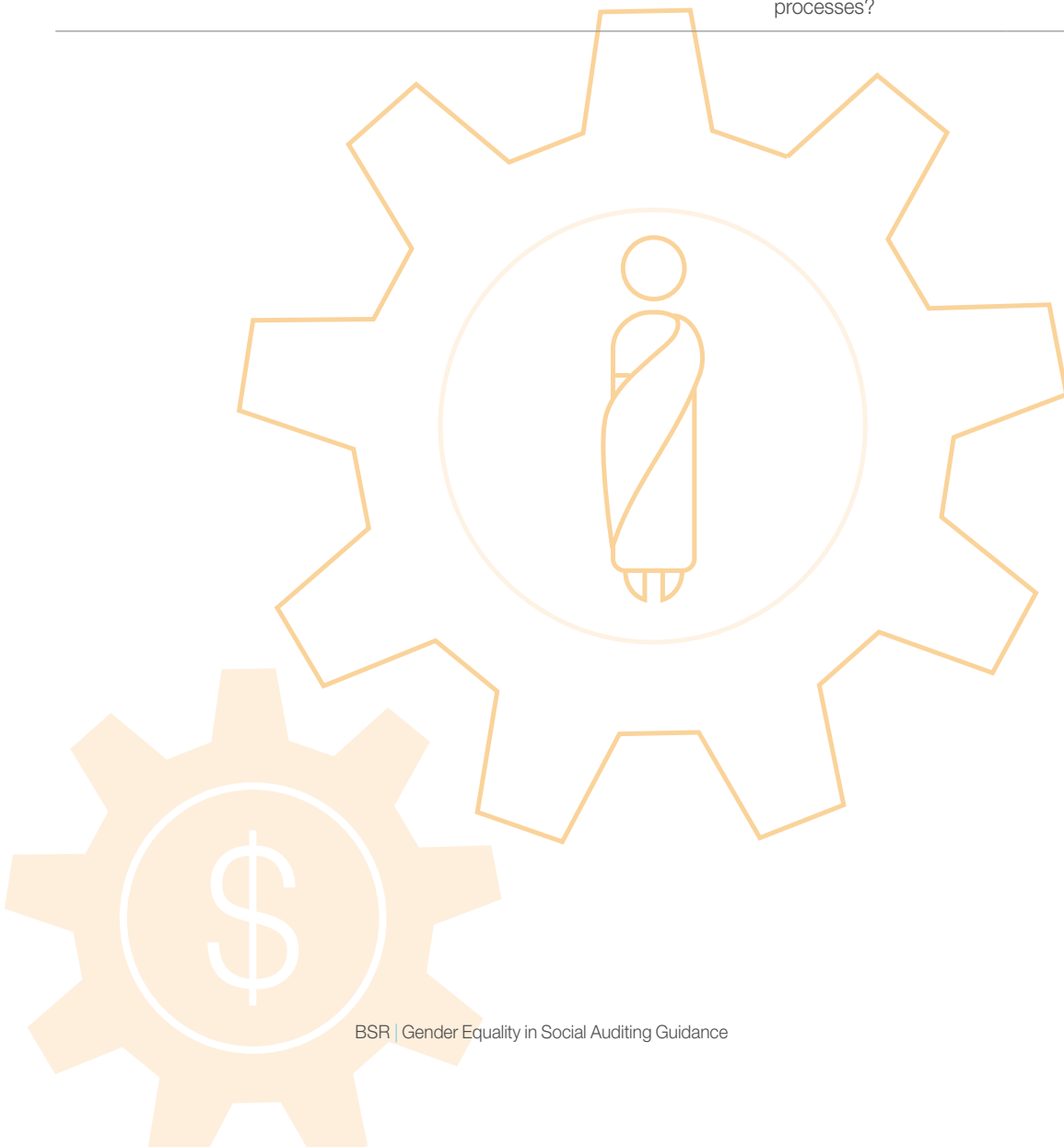
Worker interviews are key to corroborating and uncovering serious violations. The table below provides a sample question flow for a semi-structured worker interview scenario on management systems and the possible related findings. In addition, the different techniques that are used to phrase the questions have been highlighted (see also worker interview section).

Management Systems: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>1 There are certain issues that mostly female workers face. For example, it is more common for men to make women feel uncomfortable than the other way around. What are your thoughts on this? Would you agree?</p> <p>2 For these issues that affect more women than men, it is only normal that all workers are made aware of what they are. Can you give me a few examples of things that men might do that make women feel uncomfortable?</p> <p>3 Would you say workers are aware of these issues? Is feeling uncomfortable (such as if a man grabs you) something that you accept?</p>	<p>Is the worker aware of sexual harassment? What about the rest of the workers?</p> <p>Is it accepted? Gauge whether they would raise the issue or if they would consider it acceptable.</p>	<p>Building Rapport</p> <p>Question Type: Mix of Indirect and Open-Ended</p>
<p>4 Have you ever received trainings on these issues? When? How often? Where?</p> <p>5 What happens when a women worker feels like a man makes her feel uncomfortable or feels threatened? Who would she go to? Walk me through what would happen; what is the process of making a complaint?</p> <p>6 Is there a place where workers can get the information necessary about who to talk to and what the procedure is?</p> <p>7 Who can access this mechanism? Is it reserved for just a few workers? What about new or temporary workers? What about workers who speak another language?</p>	<p>It is easy for workers to be prepped to answer yes to these types of questions. Delve deeper to see whether or not he/she can give you full answers about when and where these trainings happen.</p> <p>Is there a grievance mechanism, and if so, how aware are workers of it? Where do they get their information?</p> <p>Are all workers reached (regarding how to use grievance mechanisms)?</p>	<p>Bulk of Questions</p> <p>Mix of Indirect and Open-Ended Questions</p>

Management Systems: Sample Worker Interview Scenario

Questions	Possible Findings or Conclusions	Methodology and Structure
<p>8 I heard some workers have used these mechanisms. Have you ever heard stories of workers using it? Does it work? Tell me about it.</p> <p>9 What is the likelihood that workers would use the system for sensitive matters? Wouldn't they be afraid of repercussions for their claim? What if their claim is against a supervisor, wouldn't they put their job in jeopardy?</p>	<p>How has the system worked according to worker stories? Was it fair? Was the issue dealt with?</p> <p>Do workers trust the system? Would they actually access/use the system?</p> <p>Is there a fear of retaliation?</p>	<p>Level of Detail</p> <p>Question Type: Indirect</p> <p>Formulation: Deliberate Loading</p>
<p>10 How would you make the system more effective? What could be some changes made to make sure it works better?</p>	<p>Does management receive suggestions from workers and integrate them into processes?</p>	Ease Out
<p>11 How would you say management improves the existing systems?</p>		



Why Collating Gender-disaggregated Data in Supply Chains Is More Relevant than Ever for Companies

The Workforce Disclosure Initiative brings investors together to request comparable workforce data (direct and indirect) from companies via an annual survey. Its ultimate goal is to improve the quality of jobs not only in multinational companies' operations but also in their supply chains.

The 2017 Workforce Disclosure Initiative Survey was sent to 76 global companies in July 2017. Forty-five percent of companies disclosed information in the pilot year, coming from a wide range of sectors and geographies. The 2018 survey was sent to 500 global companies.

Responses have been analysed and the report highlights the following:

- Two companies reported the gender composition for their critical supply chain workforce.
- 23 companies said they did not collect gender data, with most companies saying that the information was unavailable or not recorded.
- Three companies said they would collect gender data in the future. A further four companies said they collected some gender data but did not aggregate it.
- Data collected on seniority levels can help to identify where companies need to work more closely with suppliers: for example, to increase the number of women in senior roles and to identify which suppliers should be rewarded for efforts to improve gender equality in the workplace.

While there is clearly a challenge around the collection of gender data, companies can overcome this by specifically requesting gender data as part of their request for information during the supplier onboarding process. Companies need not collect data across their entire supply chain, but could do so where the risks of gender discrimination are most severe. Companies with highly changeable supplier bases may look to record the gender split of the supplier overall, rather than the gender composition of those workers hired for their specific contract.

Source: shareaction.org/wp-content/uploads/2018/04/WDI-Pilot-Year-Report.pdf



Examples of Gender Lens Integration



Fairwear Foundation Audit Report

	Total No.	Female No.	Male No.
Total number of employees			
Management and staff			
Production workers			
Apprentices			
Juvenile workers			
Migrant workers			
Pregnant/maternity leave			
Employees paid by time rate			
Employees paid by piece rate			
Permanent employees			
Fixed-term employees			
Interim agency workers			
Workers employed by sub-contractors			
Home workers			
Other: Temporary workers			



SMETA 6 Audit Report

7 No Discrimination is Practiced

(Click here to return to NC-table)

ETI

7.1 There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

A: Gender breakdown of Management + Supervisors (include as one combined group)	Male: _____% Female: _____%
B: Number of women who are in skilled or technical roles e.g. where specific qualifications are needed i.e. machine engineer I laboratory analyst	#: _____

Section 3 Focus on Worker Interviews: Towards More Gender-Sensitive Techniques



Section 3 Focus on Worker Interviews: Towards More Gender-Sensitive Techniques

Worker interviews have long been used as one of the triangulation techniques in social auditing and are critically important for identifying less visible issues, which are often bound up with social norms.

When conducted effectively, worker interviews can yield insightful findings and provide crucial information, allowing deeper root cause analysis of gendered issues. This is crucial for establishing successful remediation plans and progressing towards a more gender-sensitive workplace.

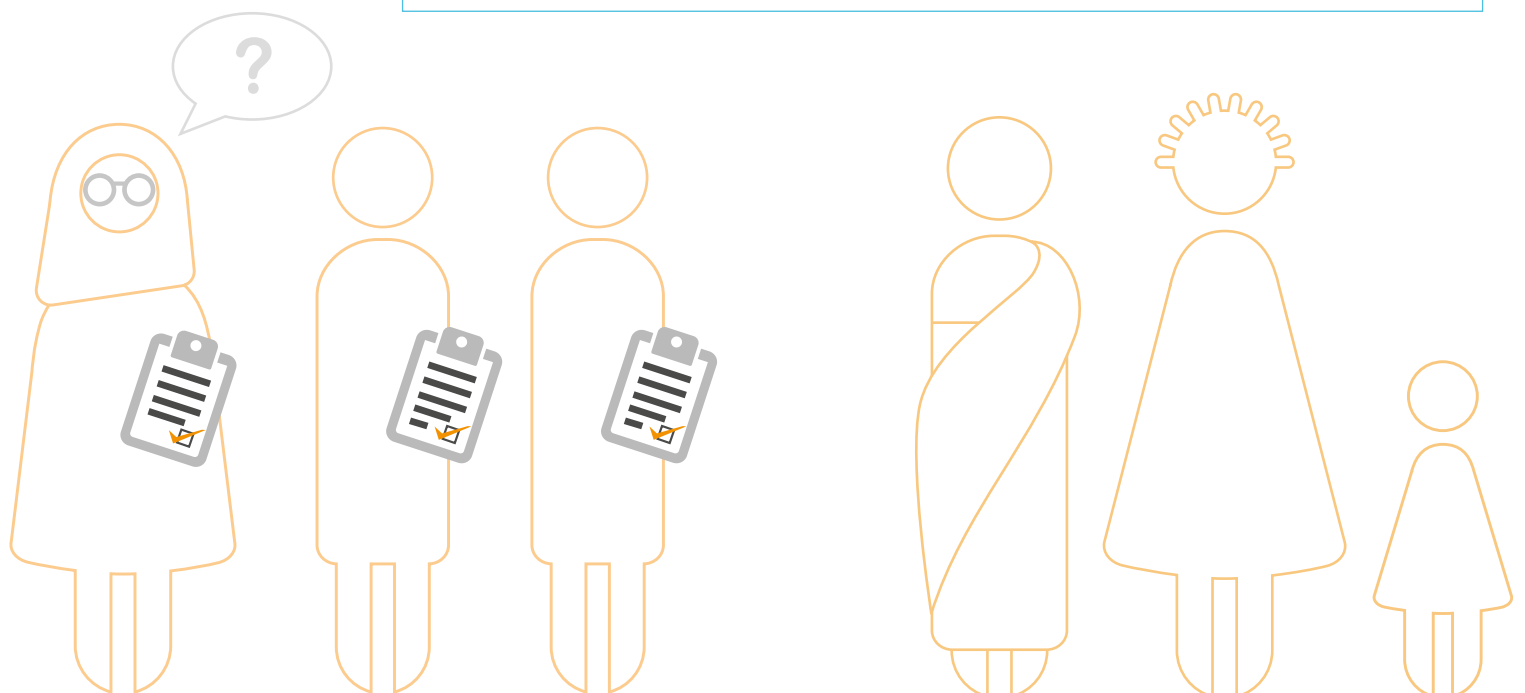
This section will explore the different elements that are essential for making worker interviews more gender sensitive, including sampling methods, types of interviews, and interviewing techniques.

Worker Interviews: Aspects to Consider

3.6.2 Best practices in gathering information from workers, including the following:

- 3.6.2.1 Interviewing techniques;
- 3.6.2.2 Worker sampling methods that best represent both the workers and the working conditions in the factory;
- 3.6.2.3 Suitability of group vs. individual interviews according to cultural circumstances;
- 3.6.2.4 The conducting of off-site worker interviews;
- 3.6.2.5 Recognition of methods of worker coaching and intimidation.

Source: http://www.ipai.pt/fotos/gca/social_auditor_standards_final_1271013426.pdf



3.1 Sampling

For best practice social audits, worker interviews must include a representative sample of people and of categories of workers within the production site, including permanent, agency, contract, piece rate, and migrant workers.

Auditors currently use their discretion within the guidelines of each scheme auditing methodology and consider industry, location, and individual facility knowledge when defining the number of employees to interview. Sampling “on-site” is crucial. Sampling approaches vary depending on the auditor and situation: from randomly selecting workers, to selecting based on employee files, to identifying vulnerable workers when performing the factory walkthrough. That said, it is recommended that the selection of workers be done as late as possible in the auditing process (ideally just before the interview is due to take place) to minimise the risk of workers being coached or intimidated.

In addition, certain aspects should be considered when making sampling more gender sensitive, whether for general social audits or issue-specific follow-up social audits:

- **Apply a sampling methodology that is representative of the worker population.** Traditionally, social audit methodologies will recommend choosing a sample that is representative of workers within a specific production site, including migrant workers and workers holding different types of contracts. This is called the stratified random sampling technique. As part of this, the gender split of a specific production site should be considered.
- **Apply a sampling methodology that is representative of the female worker population.** From a gender perspective it is recommended to identify sub-groups within the female worker population that may have different perspectives to bring forward. The [Gender Equality in Codes of Conduct Guidance](#) demonstrates how women often face double discrimination: first, gender discrimination, which can translate into the type of work/hierarchy level and/or type of contract (temporary, part-time, piece-rate) they have; secondly, discrimination related to issues like ethnicity and nationality. For the interview sample, social auditors should therefore be sure to include particularly vulnerable groups of women workers, whose rights are more likely to be violated. However, these workers are also less likely to be transparent, as they are more likely to fear reprisals and losing their jobs as a direct consequence of speaking up. From a gender perspective, it is key to add additional filters to existing sampling techniques to maximise the chances of uncovering gender-sensitive issues and their deeply entrenched root causes. This is specifically relevant for investigation audits or for follow-up audits whose specific objective may be to hone in on gender-sensitive issues such as discrimination and sexual harassment. Depending on the specific issue investigated and the spectrum of workers in the workforce, auditors will need to exercise their judgement to select the most appropriate sample. This requires a significant level of understanding of the potential root causes behind the different types of gender-specific issues. It also requires a certain degree of awareness of gender-specific local cultural norms.



³³ medium.com/laborlink-insight/how-many-questions-does-it-take-to-identify-gender-disparities-1717794f624

³⁴ www.bsr.org/reports/bsr-female-factory-workers-china_en.pdf

- **Understand country-specific gender disparities and topic-specific relevance for sampling purposes (when audit is gender topic specific).** Ensuring that decisions on sampling are informed by context-specific information may enhance the social auditor’s chances of uncovering more nuanced findings. Context-specific information can help the auditor adopt a more nuanced approach to sampling when it comes to the types of women who are selected for the interview within a specific country/ province. In each context, the needs and aspirations of women workers tend to vary by age, education, and household status. These differences may have an impact on the type of information shared and the openness of responses given during the interview process. Capturing and acknowledging intra-gender disparities within a country (and a specific industry) is equally important for sampling purposes. For instance, in China, profiling women workers based on their age has been useful for understanding strongly-pronounced disparities with regards to job satisfaction of women workers.³³ The older generation tends to value family life and a stable job, while the younger generation tends to value career opportunities, education, and training.

Figure | Chinese Women Worker Profiles Based on Age Groups³⁴



This type of social profiling and the identification of intra-gender disparities can help the social auditor assess which types of women workers are more likely to openly express job dissatisfaction and therefore provide insights into violations and gender-specific issues faced by women within a specific workplace.



Key Issues for a Gender-sensitive Approach to Social Auditing

The following characteristics, typical of female workers in developing countries, are of key importance when considering the nature of the approach and methods to be used in the social audit process, if the developmental aspect is to be realised:

- A low literacy level
- A lack of awareness of their rights as workers in civil society
- Cultural norms and beliefs that dictate the subordinate role of women in society.

Source: <https://www.ids.ac.uk/files/dmfile/Wp237.pdf>



³⁶ www.sustentables.org/Documentos/RA2017/RA-P-SP-1-V1.2%20Sexual%20Harassment%20Policy.pdf

³⁷ slconvergence.org

³⁸ https://www.rainforest-alliance.org/business/sas/wp-content/uploads/2017/06/12_freedom-association_en.pdf

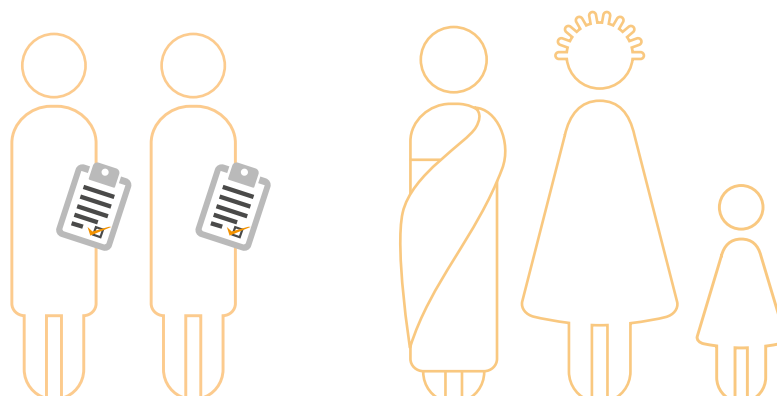
According to the BSR auditor survey, younger, more empowered women are in general more likely to speak up than older, more established women workers. However, this finding may vary depending on the local context and culture, which influences the openness of women workers. In fact, a variety of other factors have been highlighted as defining criteria for collecting insights: educational background, facility location (urban versus rural), time spent at the factory, and marital status.

It was also commonly reported that men sometimes answer gender-sensitive questions more candidly than women. This may be explained by the fact that most men, who have integrated and accepted inequitable (and beneficial) gender norms, feel themselves to be in a dominant position and thus feel safe in answering these questions. Women may find the same types of questions more threatening because of their vulnerable position in a male-dominated society (see page 102 for questions that can be considered as “threatening” for more detailed examples).

In addition, when investigating specific issues such as sexual harassment, it is important to include in the sample women who are considered to hold a social stigma. For example, in addition to vulnerable workers such as migrant women workers, widowed, pregnant, and divorced women are more likely to become the target of sexual harassment than married women workers. Such women are deemed less likely to report sexual harassment because of how they would be stigmatised by society (including their peers) based on their social status. The Sustainability Agriculture Network’s additional social auditing guidelines for sexual and psychological violence against women (see following page) includes in its sampling methodology the requirement to interview “women who are pregnant, divorced, separated, or widowed as well as young and single women, casual workers, informal workers and migrant workers or workers infected with HIV.”³⁶

- **Interviewing union/worker representatives and gender committee members.** The Social and Labour Convergence verification protocol requires union and worker representatives, where they exist, to be interviewed during the verification process.³⁷ If union and worker representatives can also support the organization of interviews, it is crucial that the auditor selects workers who are not put forward by the union/worker committee, especially if there are suspicions that the union/worker committee is influenced by supplier management. In July 2017, the Sustainability Agriculture Network issued additional guidelines on how to investigate freedom of association issues in specific high-risk countries (Belize, Colombia, Costa Rica, Ecuador Nicaragua, Honduras, Guatemala, Panama) for the banana and pineapple sectors.³⁸ These guidelines include recommendations on how to verify the existence of effective and independent unions/worker committees. Where gender committees or appointed persons exist, these representatives should also be included in worker interviews to better understand the gendered-related issues and actions put in place.

- **Other considerations.** In addition to the site workforce, it is crucial to informally collate insights from external contractors or service providers, such as security guards or transportation drivers, and from on-site providers such as doctors and health staff or canteen and cleaning staff, who may have valuable experiences to share on gender norms and practices.





SAN Additional Social Methods for Sexual and Psychological Violence Against Women

Crops: Tea

Countries: Burundi, Ethiopia, Kenya, Malawi, Mozambique, Rwanda, Tanzania, Uganda, and Zimbabwe

2.2 Selecting a representative sample of interviewees

- a. The sample of interviewees shall be selected based on the stratified random sampling technique relying on human resource data about the operation's number of employees provided by the operation in the application to the CB.
- b. The following sampling parameters should be considered that can detect vulnerable groups when defining the sample of interviewees for social topic interviews in high risk regions:
 - Age
 - *Ethnicity including origin and ethnic group (workers of different origin within the same country, foreigners, indigenous people from different tribes)*
 - *Gender: women and men—by work function*
 - *Employee status: permanent, temporary, part time workers, workers paid by piece rate*
 - *Hierarchy level: operations, supervision, management*
 - *Type of work they perform*
 - *Time working for the organisation*
 - *For the risk scenario of sexual harassment, women who are pregnant, divorced, separated, or widowed shall be included in the interview sample, as well as young and single women, casual workers, informal workers, and migrant workers or workers infected with HIV.*
 - *To complete the audit investigation about gender discrimination, violence, and sexual harassment, on-site subcontractors and suppliers, such as cleaners, canteen staff, construction crews, clinic nurses and doctors, dormitory and security guards, as well as transport service providers should be interviewed.*
- c. The audit team should dedicate at minimum 50 percent of the audit time on interviews with workers.
- d. Individual interviews can be followed by additional group interviews to confirm evidence of possible non-conformities.

Source: www.sustentables.org/Documentos/RA2017/RA-P-SP-1-V1.2%20Sexual%20Harassment%20Policy.pdf

3.2 Interview Location and Confidentiality

³⁹ <https://link.springer.com/article/10.1007/s10551-005-3415-y>

Social audit interviews are generally conducted on supplier sites and are subject to time, economic, and logistical constraints. Worker interviews should be conducted in private and quiet spaces and away from the management office to avoid interference and preserve confidentiality of the topics discussed.

According to research in the sports footwear, apparel, and retail sectors, optimal worker interview results have been achieved when the supplier management did not take part in the worker selection process and when interviews ensured confidentiality by being conducted outside of the workplace.³⁹ For example, Fair Wear Foundation auditors perform offsite interviews prior to the announced audit to circumvent the coaching of workers and to better prepare for the audit itself. These interviews should be conducted in suitable locations, i.e. public spaces such as local cafes or shops, or potentially workers' homes if safer for the worker. Some of these interviews are conducted informally around the factory, or within a compound that hosts several different factories. In any case, when arranging the interviews with women, auditors should adjust the location and timing to accommodate workers' domestic responsibilities. Offsite interviews have proven extremely useful for gathering accurate sensitive insights, thus better informing the conduct and focus of the audit, and in particular for:

- Understanding gender norms and practices
- Highlighting the connections between the workplace and the community

However, unless auditors can officially connect the interviewed workers to the specific factory/ workplace that receives the audit, most of the information collected offsite through informal discussions cannot be recorded as evidence during the onsite audit exercise. Informal interviews may also be conducted during an observation walk of the site or through casual discussions during lunch or worker breaks.

Finally, it is common practice for auditors to leave a contact number, preferably a direct line, to allow the interviewed workers to signal any case of retaliation or attempts of intimidation.



Example of Offsite Interview Procedure



“ Depending on the size of the factory, different numbers of interviews take place before the factory inspection. For example, at a factory with 50 to 500 workers, the interviewer should ideally interview 10 workers off site and one or two local stakeholders in addition. Within two days after the interview, the interviewer writes a short report with a consolidated (but detailed) overview of the findings of all interviews. The interview report is given to the audit supervisor (and is not distributed further). During the preparatory meeting of the audit team, the worker interviewer informs the other members of the team about the most important areas of concern resulting from the interviews. During the factory inspection the audit team crosschecks these issues with the other sources of information (management interview, company books, workplace inspection, consultation of local stakeholders).

Source: www.fairwear.org/wp-content/uploads/2016/06/FWFauditmanual-march2012.pdf

3.3 Semi-Structured Interviews (SSIs) versus Focus Group Discussions (FGD)

⁴⁰<https://www.ids.ac.uk/publication/participatory-social-auditing-a-practical-guide-to-developing-a-gender-sensitive-approach>

Semi-Structured Interviews (SSIs) are interviews that are conducted face to face on a one-to-one basis with workers. Group interviews or Focus Group Discussions (FGDs) are informal group conversations facilitated by an auditor, allowing three-way flow discussions: a dialogue between the auditor and the participants, and between the participants themselves.

The ability to talk more freely and discuss issues within the safe “anonymity” of the focus group tends to generate active participation and a more open attitude. Importantly, it also provides a sense of cohesion and raises awareness of the potential that “the group” provides with respect to bargaining. It is therefore paramount that supervisors are not present during FGDs, as their presence can distort what workers say. This exercise also has the advantage of providing interviewers with a multifaceted understanding of an issue through the comparison of opinions and perceptions, including by gender. This can lead to more efficient identification of the root causes of issues. FGDs are also preferred for gathering bigger data sets on commonly-experienced issues. Single-sex groups tend to yield more in-depth information on specific issues than mixed-sex groups, as women feel less comfortable disclosing information in the presence of men and men tend to dominate the discussions. However, mixed-sex group discussions can be helpful for witnessing gender norms and power imbalances within the workforce. Beyond the purpose of issue identification, they also have the potential to promote better understanding between different sexes (by providing insights into the other’s perception, situation, and needs).

During social audits, both types of interviews can be used to cross-check the information yielded by the other, based on the notion that some workers will not disclose the same type of information or the accurate information in SSIs and/or in FGDs. Of course, the auditor should be able to decipher and react to unspoken cues and signals from workers. For instance, the auditor may pursue SSIs with workers who feel more comfortable talking about these issues on a one-to-one basis, and may transform planned SSIs into FGDs when the SSIs don’t seem to result in any meaningful exploration of issues.

A study in the African horticulture sector found that men often denied the existence of sexual harassment in the workplace when interviewed in SSIs but openly discussed it in FGDs.⁴⁰ (For more insights on the study’s findings on men’s and women’s participation in different types of interviews, see the following page.) The same study also shed some light on interesting gender differences regarding how women and men perceived and behaved in the two interview types. Of course, the varying response to the two approaches is not only gender specific but culturally influenced. Nevertheless, the findings are highly relevant for understanding how women and men in specific contexts may react differently to certain interview structures. In this case, the learning has contributed to procedural recommendations that are worth considering when thinking about the sequencing: for instance, conducting SSIs before FGDs allows auditors to familiarise themselves with the local situation. This knowledge can then help auditors facilitate group discussions during the FGDs. Equally, off-site interviews would also allow auditors to gather insights prior to FGDs.

Most supply chain initiative auditing methodologies allow for a mix of individual and group interviews, recognizing that they yield different types of insights and serve different purposes. With this in mind, and before planning for worker interviews, the auditor should identify which interview approach is better suited to the objectives, the context, and the culture, as well as the auditor’s own knowledge of the region and site. It has been commonly reported that auditors tend to choose SSIs over FGDs as they feel less comfortable facilitating group discussions, which require a different skill set than for SSIs.



Case Study

An African Horticulture Study Learning From Male and Female Participation in Semi-Structured Interviews (SSI) and Focus Group Discussions (FGD)

Semi-Structured Interviews

Both women and men participated willingly in SSIs and provided adequate personal data, but:

- Women took longer than men to relax and respond openly to questions, sometimes as a result of being shy, or through a lack of understanding of what was being asked; once they had built up some confidence, however, women were able to give good in-depth data.
- Women also took longer than men to build up trust in the facilitator. This was particularly the case when facilitators were men—a lot more prompting and probing was needed to get information in SSIs, especially from young women.
- Women felt uncomfortable providing information on issues such as harassment.

Focus Group Discussions

Although both men and women participated well in group discussions, women enjoyed them more than men. This varied, however, according to the structure of the group, with all-female groups producing the greatest amount of participation. Gender issues were particularly well discussed by both old and young female workers, regardless of work category. In general, FGDs:

- Actively involved people, producing in-depth and wide-ranging information, with all-female groups and all-male groups openly discussing relevant gender-sensitive issues.
- Most female participants also preferred all-female groups, while older women found it very hard to relax and respond in mixed-sex groups.
- The majority of female interviewees preferred participation in FGDs, rather than SSIs, because they felt more confident together and could remind each other, check information, and correct each other.
- More articulate participants (often synonymous with higher job status/education, for example permanent workers) contributed more information.
- Male participants in mixed-sex groups preferred participation in FGDs to individual interviews.
- Groups of non-permanent, male workers in a single-sex group were very vocal, talking openly and freely, whereas female groups required more encouragement and time to do the same.
- In mixed-sex groups, whether males dominated the discussion largely depended upon the age and seniority (in years of service) of the women in the group. Younger, more educated women were very vocal in mixed-sex groups.

Source: <https://www.ids.ac.uk/publication/participatory-social-auditing-a-practical-guide-to-developing-a-gender-sensitive-approach>

3.4 Worker Interview Approach

⁴² www.ncbi.nlm.nih.gov/pmc/articles/PMC4462781

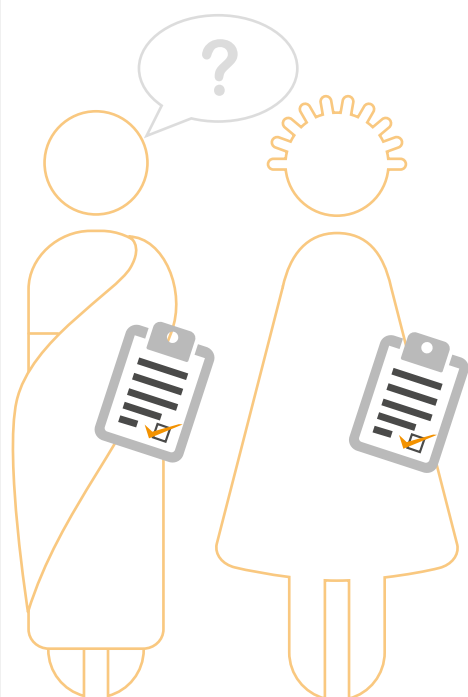
Techniques used in worker interviews are most often gender-blind in their approach. As a result, worker interviews often fail to gather valuable insights, specifically on gendered issues. The auditors' capacity to conduct gender-sensitive interviews will partly determine how likely these are to yield valuable insights.

Acknowledging Both Auditor and Worker Bias from the Outset

Conducting interviews, whether as part of an audit or for research purposes, is far from a neutral exercise. The auditor's values and opinions affect which gender nuances are observed, identified as violations, and therefore reported on. Even the auditor's position in society (in terms of gender, class, ethnicity, and age) may influence the way in which the interviews are conducted, how the information is analysed, and how the results are interpreted. Deciding which information is relevant and should be reported is not always an objective process. As an example, local knowledge and information provided by marginalised groups is often given less credit than information provided by decision makers, scientists, or like-minded people. Despite women's making up the majority of workers in most light manufacturing and agricultural supply chains, their opinions and statements are traditionally dismissed when compared to those of male supervisors. To get as close as possible to an objective assessment, it is important to acknowledge one's own bias, preferences, values, and socio-cultural background, and to be constantly aware that these factors could influence the process of the research and its findings.

As commonly acknowledged in social science research, "social desirability bias" is key to understanding the complexity of dynamics at play when interviewing workers. The social desirability bias refers to the tendency of workers to over-report socially-favourable attitudes and behaviours for questions on sensitive topics. For example, historically, Indian women have been made to adopt contradictory roles. The strength of a woman is evoked to ensure that women effectively play their traditional nurturing roles as daughters, mothers, wives, and daughters-in-laws. This may lead to a sense of sole responsibility as a homemaker and carer, which has an impact on how women position themselves in the context of paid versus unpaid work. This in turn has an impact on access to work and working hours. On the other hand, the stereotype of "a weak and helpless woman" is fostered to ensure complete dependence of women on men.⁴² This may have an impact on how low wages and harmful attitudes towards gender norms, including the normalisation of gender-based violence, are integrated. Such acts are mostly unreported because they are considered "accepted" behaviours. Understanding these different dimensions that make up the cultural norms of a community, region, and country is fundamental to interpreting how workers may position themselves regarding specific gender-sensitive questions. Workers who have attitudes that challenge traditional social norms may be hesitant to admit these, even in the relatively anonymous setting of a survey, let alone in a more open and less confidential interview setting.

To move past this ingrained bias, we recommend taking the necessary measures to minimise the level of bias that auditors could unintentionally bring to audits, which would obstruct their ability to accurately detect gender-sensitive issues. This can be achieved, for example, by organizing unconscious bias training to unpack gender roles and attitudes, as well as ensuring regular exchanges amongst auditors about their experience of being confronted with gendered issues during audits.





Q The Social Desirability Bias

“ Probably the most frequent source of bias is the propensity of the respondents to want to please whoever is hosting the test. They give the answers they believe are wanted instead of the truth. Or, they hide realities that embarrass them. It’s a frequently-observed human reaction, known in social science as ‘socially desirable responding’. Phrasing questions in a way that deflects ego is often enough to solve this problem.

Source: <https://www.sbs.ox.ac.uk/sites/default/files/research-projects/GBCWEE/RES-0054-GBCWEE-Report-171123.pdf>

Gender-related Questions Can Be Considered “Sensitive”

Research shows that when sensitive topics are addressed, respondents may refuse to:

- Cooperate in the survey (which leads to “unit non-response”)
- Refuse to answer specific questions (which leads to “item non-response”)
- Tend to answer dishonestly⁴³

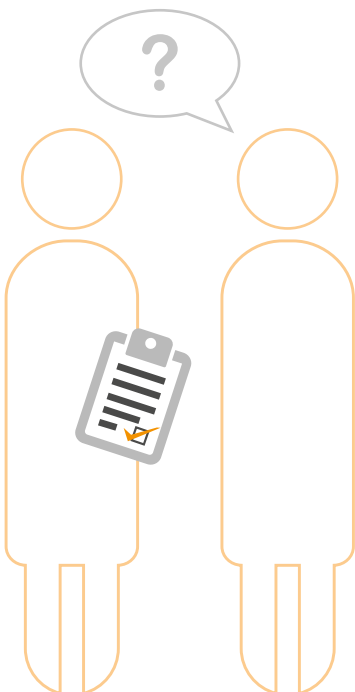
Worker interviews that are conducted face-to-face—and that are therefore less anonymous than surveys—are even more likely to generate such reactions.

Types of questions that might be classed as sensitive include: private information (such as income), illegal behaviour (such as the use of controlled substances), and socially-stigmatizing behaviour or opinions (such as sexual harassment). Gender topics can be particularly taboo in specific societies, and the underlying stigma can make women feel “ashamed” to report an issue. As a result, conducting interviews with the objective of collecting accurate and valid information on gender practices and norms in a specific factory or farm can be challenging for social auditors.

Furthermore, there is a growing body of literature and testimonies that demonstrate the investment that some suppliers make in preparing workers for these social audit interviews. This practice involves site managers coaching workers to provide the “correct” information during audit interviews and preventing less “compliant” workers from being selected during interview sampling. Workers who most often find themselves in vulnerable positions agree to this practice, driven by the fear of job loss or other forms of retaliation. This practice presents an additional barrier to achieving the objective of an inherently difficult exercise: getting a truthful representation of issues such as gender norms, discriminatory practices, and sexual harassment.

There are different levels of sensitivity that should be considered when developing semi-structured questionnaires that workers will feel comfortable answering honestly. Misreporting and nonresponse rates are reported to be much higher when questions are devised in ways that do not consider these levels of sensitivity. It is crucial to assess questions based on the level of threat contained in both the ask and/or the potential answer as:

- Asking a specific question can be considered as threatening (regardless of the answer)
- Answering a specific question can be considered as threatening (because of the consequences that may be associated with workers’ answers)



⁴⁶[books.google.fr/books
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PA312&lpg=PA312&dq=
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Below are some examples of gender-related questions that may be perceived as a threat by workers regardless of the answer (because of prevailing gender norms and stigmas), as well as questions where workers may fear answering honestly because of the potential related consequences (job loss and other means of retaliation):

Threatening to Ask Men:

Any topic that could feel threatening to male workers' stereotypical roles as men:

- 'Has a woman received a promotion you had presented yourself for (over you)?'
- 'Has a woman supervisor ever questioned your technical abilities?'
- 'Do you earn less than your wife?'

Threatening to Ask Women:

Any topic that could be sensitive for women living in male-dominated societies:

- 'Do you think men have the right to beat their wives?'
- 'Have you been subjected to a pregnancy test on joining the factory?'

Threatening to Answer for Women and/or Men:

- 'Has a supervisor or manager ever shouted at you? Hit you? Touched you in a way that made you feel uncomfortable?'
- 'Are men/women better supervisors than women/men?'

Building Rapport

It is crucial for auditors to begin the interview by introducing themselves and explaining the interview's objective. Furthermore, it is important that auditors guarantee that workers' answers will be completely anonymous.

In general, building rapport should be the auditor's primary concern, before jumping into more specific questions (including but not limited to gender-sensitive issues). This pre-interview moment with workers requires social auditors to seek out comparable experiences and build some type of empathy with workers.⁴⁶ Understanding workers' lives and the realities they face on a day-to-day basis is essential for seeing eye-to-eye with them. We therefore recommend that auditors begin the interview with questions that build rapport between both parties.

Examples of such questions include:

- 'How are you feeling? Can I get you anything?'
- 'I heard there was a [festival] last week. How was it?'
- 'These are beautiful earrings, where did you get them?'

Tips to Build Rapport

- **Have a hook:** find out what events took place in the past month (in the surrounding community, at the workplace, and nationally) to have a conversation-starter and break the ice.
- **Don't ask boring questions:** questions like “do you like living here?” will not get workers to relate to you. Ask questions about food or activities that you know are normally popular amongst women. Auditors should have enough local knowledge to be able to make workers relate!
- **Don't ask too many context questions:** although questions are vital for building rapport, asking too many can make you look nosy, so keep it brief.
- **Let workers do the talking:** the “80/20 rule” also applies to rapport-building. Ask the right questions (20 percent) and let the respondent do most of the talking (80 percent).
- **Build on the conversation:** show workers you are listening by asking questions that relate to their answers.
- **Questions that are considered as threatening hold a stigma and answers that could entail retaliation can be considered as threatening.** See the sample scenario on sexual harassment (section 2.5) and discrimination (section 2.1) to understand how context-setting and deliberate loading can be used.

Specific Techniques: Context Setting and Deliberate Loading

During interviews, as the likelihood of inaccurate responses is high for gender-sensitive questions, it is important for the auditor to be equipped with helpful pointers for asking questions to workers. To mitigate the sensitive nature of gender-oriented questions and to maximize the chances of uncovering new or of confirming suspected gender-related issues, the following techniques should be considered when developing semi-structured questionnaires in preparation for worker interviews.

- **Context Setting:** It is crucial to set the context before asking any question. Social auditors should aim to provide a context that implicitly removes any social desirability. These “context setting” questions are best asked as a set.
- **Deliberate Loading:** This technique can be used to address a gender-sensitive topic so that it is deliberately made to sound casual, acceptable, and less threatening.

These two techniques focus on setting up a sensitive issue in a neutral way to remove the stigma associated with a topic, making it sound and feel acceptable. The techniques should communicate that there is neither an expected answer nor a wrong answer.

For **Context Setting**, questions are to be presented as a set, with the prior questions purely designed to set up the question of value to the auditor. Context setting questions could be formulated as below:

Example | Context Setting | Discrimination

- ‘In your community, would you say it's been more difficult for women to find work than for men?’
- ‘Have you heard of women who could not find work? Why?’
- ‘Would you say that this is a common issue? Is it true here?’

For **Deliberate Loading**, the specific question that the auditor is trying to ask should be introduced only after making the general topic sound more acceptable.

This can be done by:

- Acknowledging the existence of a specific practice/issue to remove any sense of danger or threat that the worker might feel in openly speaking about it
- Making statements that show that the auditor has a certain understanding and compassion for a difficult situation or practice

Example | Deliberate Loading | Discrimination

- 'Many people have told us that there were jobs that women could not apply for: does that sound familiar? How so?'
- 'It can be difficult to let everyone know when a new position opens. Would you say that this is the case here? Is it particularly hard to reach men or women?'

These techniques are useful to develop semi-structured questionnaires that address gender-sensitive topics in a neutral way. The specific formulation of questions—from question type to wording and translation into different languages—is crucial if worker interviews are to become a safer space for workers to open up and share personal insights.

Question Types: Indirect and Open-ended Questions

Intricately linked to the effective implementation of the above-mentioned techniques of context setting and deliberate loading, the differentiated use of indirect and open-ended questions is essential to framing worker interviews.

The use of **Indirect Questions** is fundamental in order not to address the theme under investigation too directly and bluntly, especially where personally-sensitive issues are involved. Furthermore, using **Open-ended Questions** allows for an actual dialogue between the auditor and the worker and prevents short yes/no answers.

Indirect Questions: their use enables the auditor to not set up the worker to answer a specific question. This can neutralize the stigma that can be associated with a specific topic. It therefore reduces the likelihood of answers that will respond to a social desirability bias and may induce more honest responses.

Example | Indirect Questions | Working Hours

Rather than asking: 'What are your working hours?'

Ask:

- For women: 'What does your day look like? At what time do you wake up? Take the bus to go to work? When you get home, do you have the time to attend to your children or family? Do you have time to cook? How far is your home from work?'
- For men: 'What does your day look like? When do you get home? Do you do anything before getting home? Do you stop by to see friends on the way home? How far is your home from work?'



Open-ended Questions: their use is always recommended for giving interviewees the space to speak freely. Open-ended questions will require workers to think, reflect, and give opinions and feelings, rather than providing a black-and-white answer to a factual or closed question. Answers to open-ended questions are likely to be longer.

Indirect and open-ended questions do, however, require the auditor to make certain links and deductions in order to provide an answer for what is in fact “under investigation.”

Example | Open-ended Questions | Health and Safety

Rather than asking: ‘Do you know where the fire exit is?’

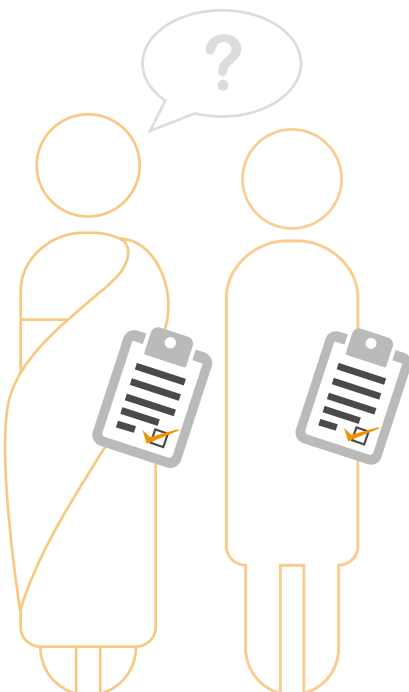
Ask:

- ‘When you need to leave the premises/facility in an emergency, which route would you use?’
- ‘Are there other ways out? Why do you use this specific exit?’

Formulation of Questions

It is important to make the interview as easy as possible for the worker, as this will allow for a more fluid conversation. Below are several elements to consider while formulating your questions:

- **Familiar Wording:** the use of jargon can be detrimental to effective worker interviews:
 - Using vocabulary that workers understand is essential for getting information. It is important to occasionally check that workers understand the terms that are being used throughout the interview (even if they do not ask for any clarification), rather than assuming they do. Language that is obvious to the auditor could be unfamiliar to workers, especially when the language spoken by the auditor is not the worker’s maternal language, when literacy is particularly low in the area, or when the auditor is discussing technical terms. In addition, some terms do not necessarily translate into some languages.
 - Workers relate to wording and situations they are familiar with, so using local language and familiar wording enables the auditor to narrow the distance created by the somewhat artificial exercise of an interview.
- **Level of Detail:** the more detail that auditors request in a question, the more likely they are to alienate the respondent. It is good practice to start off with high-level categories or response scales, and build on those to find out more.⁴⁷



Example | Familiar Wording | Harassment

BSR asked women workers in an Indian factory about the existence and uptake of grievance mechanisms. All women knew about the system but they did not understand a legal term such as ICC (Internal Complaints Committee), or they did not understand the word “training”. The BSR representative had to explain, and this enabled women workers to answer.

Rather than asking: ‘Do you know if there is an Internal Complaint Committee (ICC)?’

Ask: ‘When someone has a complaint or needs to report an issue, who can they go to that will listen and hear them out?’

Rather than assuming workers understand the question: always check if the question, words, and wording are clear and understood in the same way by the interviewee and the interviewer.

Ask: ‘Does that make sense?’

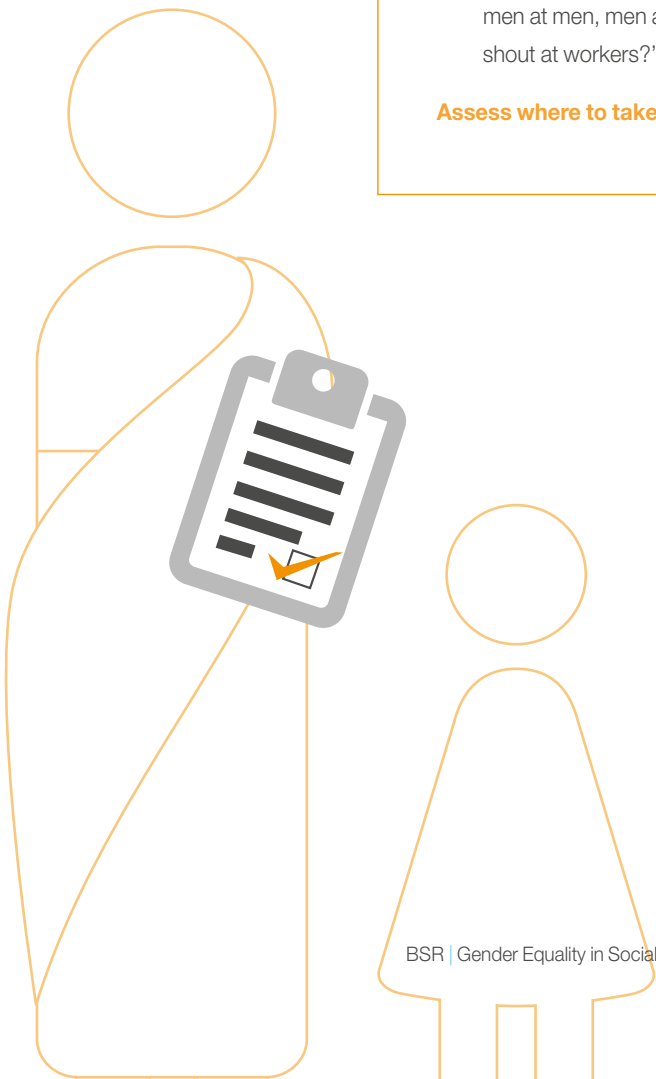
Example | Level of Detail | Harassment

Rather than asking: ‘Have you ever been shouted at by your supervisor?’

Ask: ‘I heard it is not that unusual for people to shout at each other.’

- ‘Have you heard stories of people getting shouted at in public within your community?’
(Ask for the story and who was shouting at whom.)
- ‘Would you say you’ve also heard these types of stories in the neighbouring factories?’
- ‘Does shouting occur at work sometimes? Regularly? Who normally shouts (women at women, men at men, men at women)? Are there workers that shout at each other or supervisors that shout at workers?’

Assess where to take the questions by building on answers.



Section 4 From Risk Management to Impact Measurement: Putting Worker Engagement at the Heart of Change



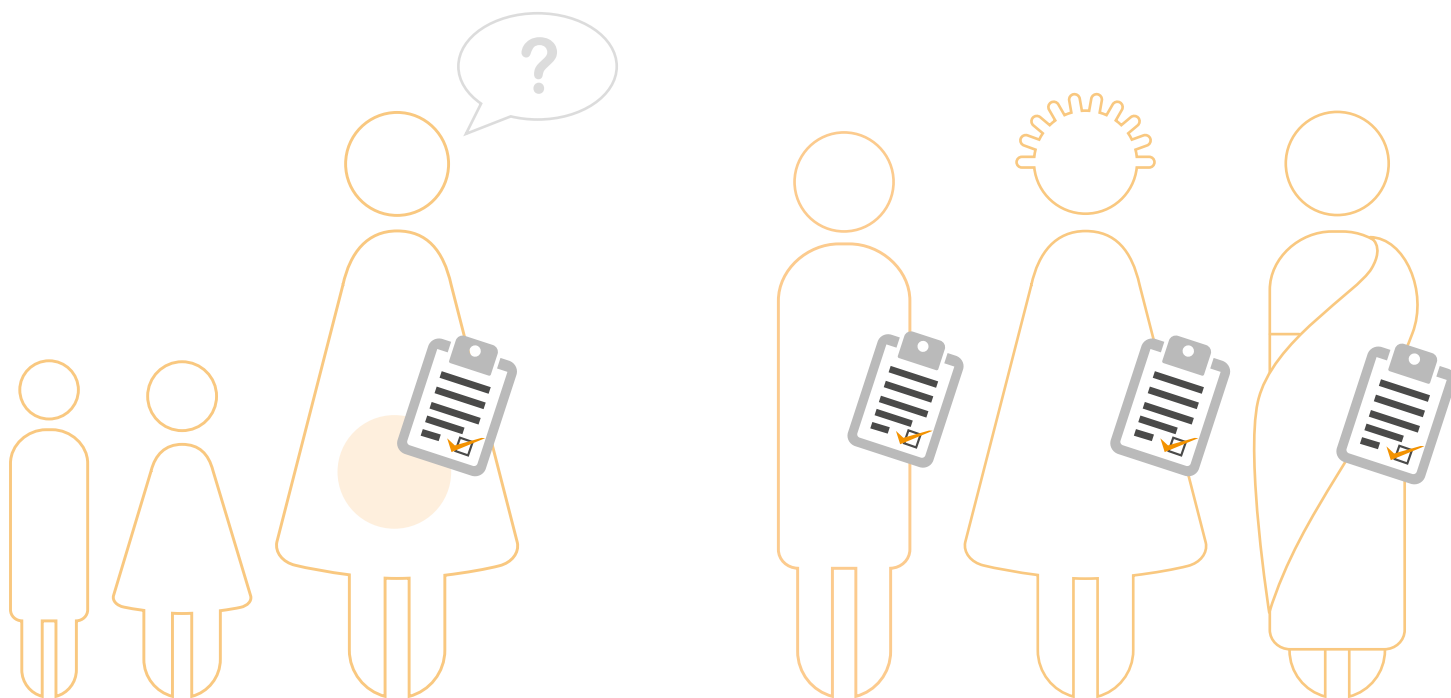
Section 4 From Risk Management to Impact Measurement: Putting Worker Engagement at the Heart of Change

Recent years have seen a growing momentum for going “beyond audit”, putting worker engagement at the heart of the debate. More and more companies and organisations have therefore focused their efforts on worker engagement programmes, with the twofold objective of gathering better insights into worker well-being and supporting suppliers’ own efforts to drive workplace improvements.

Ultimately, the main objective remains to invest in remediation activities that lead to actual transformational change, supporting the fulfilment of an overall vision for a workplace where human rights are protected and workers engaged. There is a consensus among stakeholders that to develop deeper and more specific insights into workplace issues and the best ways to fix them, it is vital to put workers centre stage. Workers are not only key to better identification of the issues; they are also part of the solution. In this continued shift from “knowing” the issues to “changing” the issues in supply chains, and from “compliance” to “transformation,” workers are fundamental to the process.

The transition to worker engagement can be enabled by a range of innovative tools and methodologies, from focus groups and workplace cooperation groups to technology-enabled information-gathering solutions. In this process, suppliers are equally important to the conversation, as little meaningful change can be achieved without their involvement and active ownership of issues. Suppliers must start linking the findings from worker engagement approaches to concrete workplace interventions for “beyond compliance” approaches to be successful.

This section identifies different approaches to worker engagement, assessing those that have the potential to be integrated within the auditing process, those that could complement social audits, and those that could partly replace audits.



⁴⁸ www.gsma.com/mobilefordevelopment/programmes/connected-women/the-mobile-gender-gap-report-2018

4.1 Worker Engagement Approaches and Tools

Three broad types of worker engagement approaches have been identified and will be the focus of this chapter:

4.1.1 Traditional Worker Voices Mechanisms

4.1.2 Technology-Enabled Worker Voices Solutions

4.1.3 Participatory Learning and Action (PLA) Approaches

Traditional Worker Voices Mechanisms

The most traditional workplace worker voices mechanisms, when accessible and functioning, are the most efficient way to uphold good workplace practices. From trade unions or worker committees to grievance mechanisms, the effectiveness of these channels and structures depends on a constant and open two-way communication flow between workers (or their representatives) and management—with the ultimate purpose of finding solutions to workplace issues. Their efficacy relies on several conditions: social dialogue based on non-reprisal; a committed management function that addresses workplace issues in a timely manner; and empowered workers who feel confident about voicing their concerns. However, studies have revealed that most workers, when they do have access to grievance mechanisms, have little knowledge of how to use them and little trust in their effectiveness to redress workplace issues, including in a timely manner. In addition, contract workers (most of whom are women) are treated unequally and frequently do not have access to these mechanisms. Finally, where trade unions are legitimate, they are rarely able to voice and address women's specific needs and issues.

Technology-Enabled Worker Voices Solutions

Where traditional social dialogue workplace mechanisms have been ineffective or hampered by local jurisdictions, and where audits are unable to get to the heart of workers' needs, companies have turned their attention to the use of worker surveys to understand worker satisfaction and well-being. Gathering workers' feedback has been enabled by scalable technology-driven solutions ranging from interactive voice response (IVR) platforms, texting-based platforms, written surveys, and WeChat tablet surveys (offline), with the choice of the platform often governed by the location.

It is important to note that societal barriers (cultural, infrastructural, and educational) may hinder access to digital technology and that in the context of women's empowerment in particular, the power of technology and associated social media channels has not yet fully been realized. The Mobile Gap Report 2018 sheds light on the magnitude of the existing gap in mobile internet use across low- and middle-income countries, including the gap in mobile ownership.⁴⁸ That said, mobile technology can be a cost-effective way to collate comparatively reliable data as it provides an anonymous environment to express opinions and provide insights, with a higher likelihood of collecting more candid and timely feedback, especially from women workers. As the tools can be customized, the information collated varies but most commonly focuses on worker and management relationship, working conditions, and job satisfaction, also extending to the assessment of training and grievance mechanisms.



⁴⁸ westprinciples.org/about

⁵⁰ idp-key-resources.org/documents/0000/d04267/000.pdf

⁵¹ www.ids.ac.uk/files/dmfile/Wp237.pdf See research done in the African horticulture sector.

⁵² According to the latest Bangladesh Shrama Institute study, “Barriers to Women’s Participation in Trade Unions and Labour Organisations,” female workers in 17 registered Bangladeshi trade unions told researchers that they had been sexually harassed by union leaders.

The most frequently used tool is technology-enabled surveys. The data generated through these can help diagnose hot spots and pinpoint where there is a need for change. Demographic data can be disaggregated by gender, which allows for a gendered analysis of findings and for correlations between independent factors. The tools, however, do not necessarily yield the same type of qualitative information that well-facilitated Focus Group Discussions (as part of or outside of an audit) or other worker participatory approaches may provide. The analysis of the data requires a specific understanding of the context if it is to be useful in unearthing root causes. This context will not be provided in the results of questionnaire.

Designing a high-quality questionnaire (with questions that are relevant, carefully phrased, and understood by women workers)—as well as the extent to which women workers are engaged and trust the exercise—remains of crucial importance for gathering insightful results. An additional obstacle is that, unlike in face-to-face interactions during focus group discussion, questions and responses cannot be easily clarified when technological solutions are used. On the one hand, these tools should not be considered as a replacement for worker representation mechanisms such as trade unions and worker committees, as they remain a one-way anonymous communication channel. On the other hand, such tools can also be used to deliver other types of services that are beneficial to women such as literacy programmes, access to health information, safety assistance, and notice of legal rights.

With the aim of regulating the quality and impact of these newly-developed technologies driving worker engagement efforts, a group of organisations and industry experts co-authored the *Worker Engagement Supported by Technology (WEST) Principles* to develop best practice on designing and implementing such technologies.⁴⁹

Participatory Learning and Action (PLA) Approaches

PLA approaches have not been traditionally used in the context of or as a complement to social auditing. They have more commonly been used in development work, with a focus on learning through engagement with communities. PLA approaches are a combination of participatory and visual methods with natural interviewing and facilitating techniques, and their primary objective is to support a process of collective analysis and learning through face-to-face group exercises.⁵⁰ The approach, which has more often been used in communities than in a workplace setting, can be used for different purposes, including identifying needs and monitoring or evaluating projects and programmes. For this reason, PLA approaches may be adapted for the purpose of monitoring and evaluating the working conditions and issues faced by women supply chains workers.

These approaches can be particularly effective at getting women workers themselves to identify possible solutions to issues faced in the workplace, making PLA particularly powerful for designing remediation action plans. PLA tools can be integrated into group exercises during focus group discussions, and research in specific sectors has shown that there are some gender preferences for some of the PLA tools.⁵¹ The subtle nuances of gender norms and power dynamics can be better assessed through these types of activities than through anonymous feedback channels. However, PLA approaches are more time consuming, rely on active and open worker participation, and are heavily influenced by the quality of the facilitation provided.

The following pages provides a mapping of the most relevant tools identified under the three broad approaches to worker engagement introduced above: traditional worker voices mechanisms, technology-enabled worker voices solutions, and Participatory Learning and Action (PLA) approaches. The mapping describes these tools and their proven or potential value in identifying gendered issues.

4.1.1 Traditional Worker Voices Mechanisms

Examples of Channels, Mechanisms, and Tools

Tool Description

Trade Unions

Unions provide a mechanism for dialogue between workers and employers, which helps build trust and commitment among the workforce and has the potential to ensure that problems can be identified and resolved quickly and fairly. Unions are themselves a form of operational-level grievance mechanism. They represent their members in discussions with management and provide advice to their members when problem at work arise. A 'shop steward' or 'representative' is usually elected to speak on behalf of union members and discuss their concerns with management. In that sense, they have the potential to truly capture and represent workers' voices and contribute to transformational change. Where functioning and effective unions are present in workplaces, workers do benefit from better working conditions. Where trade unions are not legitimate or do not or cannot represent the whole workforce, other forms of worker committees should be favoured.



Gender Perspective

Trade unions have an enormous untapped potential for getting women's worker voices heard in the workplace. They are the channels through which women can gather and share their experiences from within workplaces. For women's needs and priorities to be adequately addressed by trade unions, 1) women must be properly represented in the trade union structure, including in leadership positions (this also helps to prevent union leaders from sexually harassing women workers, as reported in the latest BASHI study⁶²); 2) women working groups within trade unions should be created to ensure representation of women's needs in the trade union agenda; and, 3) trade union activities and member requirements should be adapted to provide flexible options for participation, thereby acknowledging women's care duties.

Worker Committees

Worker Committees or committees composed of a representation of the different workforce levels can be an effective management system tool, providing "ongoing monitoring" and ensuring that gender-inclusive policies and practices are upheld in the workplace, including once the auditor has left the facility.



Gender Perspective

The gender committee should include both male and female employees and play an important role in overseeing the implementation of gender policies and/or gender programmes. However, it should in no circumstances replace trade union representation when it exists and is effective. The committee should play a preventive role by raising staff's awareness of gender issues and provide a forum to address gender-related issues. This can be done through in-house workshops/gatherings, the establishment of partnerships with external organisations and the community, and the distribution of educational and supporting materials. The committee can also play a role in processing sexual harassment complaints, conducting proper enquiries, and providing assistance and redress to the victims. Function specific committees, such as Health and Safety Committees, may also play a role in representing women's voices on specific topics, which are material to the workplace.

Operational-level Grievance Mechanisms (OLGMS)

Workers' voices are also well channelled through the active uptake of effective operational level grievance mechanisms. A transparent, confidential, unbiased, non-retaliatory grievance procedure should be established allowing women and men workers to make comments, recommendations, reports, or complaints concerning their treatment in the workplace including regarding gender equality.



Gender Perspective

The design of effective mechanisms is key. However, making these mechanisms work for workers—including for marginalised and vulnerable workers such as women—is challenging. Ensuring uptake is essential. Trust in these mechanisms depends on whether and how issues are addressed (including how quickly they are) and whether workers are free from retaliation when raising complaints. Having a worker-led, gender-balanced structure that processes complaints may also help women to establish trust in these mechanisms and have confidence that the outcomes of complaints will be processed in a more gender-sensitive way.



Fair Food Program's Worker-Led Complaints Mechanism

The Program

The Coalition of Immokalee Workers (CIW), built on a foundation of farmworker community organizing in Florida since 1993, established the Fair Food Program (FFP) in 2011. CIW, farmworkers on participating farms, farmers, and retail food companies implement the FFP. The Fair Food Standards Council (FFSC) is the program's independent monitoring body and the only dedicated third party oversight organization of its kind for agriculture in the United States. The FFP "harnesses the power of consumer demand to give farmworkers a voice in the decisions that affect their lives, and to eliminate the long-standing abuses that have plagued agriculture for generations," including sexual harassment, violence, discrimination, and abuse. The FFP currently boasts 14 participating buyers, including Yum Brands (which includes Taco Bell), Walmart, Chipotle, Trader Joe's, Subway, Whole Foods, Burger King, and McDonald's. Growers representing 90 percent of Florida's tomato production have signed on to the program. The FFP also involves strawberry and bell pepper farmers in Florida, as well as tomato growers across Georgia, South Carolina, North Carolina, Virginia, Maryland and New Jersey. In mid-2018, the FFP will be expanding into other crops in Texas. The components of the FFP make up what is called the "Worker-driven Social Responsibility" (WSR) model. The key FFP mechanisms include legally-binding Fair Food Agreements between participating buyers and CIW, worker education, market enforcement rules, independent audits, and complaints resolution mechanism. All of these have contributed to ending impunity for sexual violence and other forms of sexual harassment at Fair Food Program farms, where there have been zero cases of rape or attempted rape since the implementation of FFP standards in Season One.

The Complaints Mechanism

The FFP includes a confidential complaints system that is independently run by the FFSC. This system centers on a toll-free, bilingual complaint line that FFSC investigators who know the relevant farms answer 24 hours a day, seven days a week. The hotline information informs subsequent audit interviews and worker education programs. Since its start and covering around seven growing seasons so far, the program has resolved more than 2,000 complaints. Most complaints are resolved in less than two weeks and the vast majority in less than a month. When a complaint is submitted to the hotline, the FFSC investigates the situation either alone or in collaboration with the relevant grower, depending on the specifics of the situation, and then develops a corrective action plan for implementation by the farmer with support from FFSC. Whenever possible, resolutions of complaints are made known to the other workers to demonstrate a lack of retaliation for bringing complaints and to reconfirm the grower's commitment to the program. The FFSC maintains a detailed database of complaints and corrective actions taken; an appeals mechanism is built into the system. Supervisors found by the FFSC to have engaged in sexual harassment with physical contact are immediately terminated and banned from employment at other FFP farms for up to two years. Participating Growers must carry out these terminations or face suspension from the FFP, with the accompanying loss of ability to sell to Participating Buyers. Supervisors terminated for less severe forms of harassment or discrimination also face a program-wide ban. Allegations of sexual harassment are investigated and resolved with unprecedented speed, averaging less than three weeks.

Source: <https://www.shiftproject.org/sdgs/>

4.1.2 Technology-Enabled Worker Voices Solutions

Worker Voices Technology Tools

Technology may provide a safe and anonymous channel for workers to share information from their own mobile phones from anywhere, at any time, creating a much more comfortable environment to express grievances or raise sensitive concerns.

Surveys

With a variety of new technology, IT-enabled worker surveys have flourished in the past decade and have been used to gather direct worker insights through polls and questionnaires on job satisfaction and well-being, covering issues such as health and safety, management style, and pay structure. These have been trialled mostly as complementary tool to brands' social compliance programmes. Factories that are used to being managed through audit programmes may not immediately understand the business value of gauging workers' perceptions. This may sometimes lead to attempts to manipulate survey results.

However, surveying via technology makes it possible to detect a variety of patterns that indicate data falsification as well as survey interference. Comparatively, these instances of survey interference and coaching are incredibly hard to detect and prove when they occur during an audit's in-person interviews. Data analysis is also provided by these tools but solely based on the data collected during the surveys, which may result in misleading conclusion if lacking context and local understanding.

In a side-by-side comparison with hotlines and in-person interviews, one mobile survey provider states that mobile surveys have eight times greater disclosure when asking sensitive questions on topics such as on sexual harassment or discrimination.



Gender Perspective

This approach may be useful when striving to unearth how pervasive gender-sensitive issues such as discrimination and sexual abuse are. It can also be used to track trends and progress for specific workplaces year after year.

Hotlines

Hotlines are direct and immediate telephone linkups, as used in a crisis. This allows workers to voice concerns or issues completely anonymously. Hotlines can be used within any size of organization, from small, family-run organizations to large multinational companies.

The key to the success of the hotline is that employees are reassured and have confirmation that they can come forward without fear of retaliation, and most importantly that they have the right to remain anonymous. Both commitments are integral to the success of implementing this type of programme.



Gender Perspective

This tool may support effective grievance mechanisms by providing information to factory and farm managers, giving them an opportunity to act and resolve small problems before they become bigger ones. Specific gender-related grievances such as sexual harassment, which may not be commonly reported in other more traditional grievance settings, may surface more easily through these channels. However, given the anonymous nature of this tool, it does not allow for specific individual remediation measures.

Social Media

Allows people to connect with each other to create and share information.

It is people-powered communication, and as social media has matured, so has the ability of people to voice their opinions as workers, customers, and consumers in a public manner.

Applications such as Facebook, Instagram, SnapChat

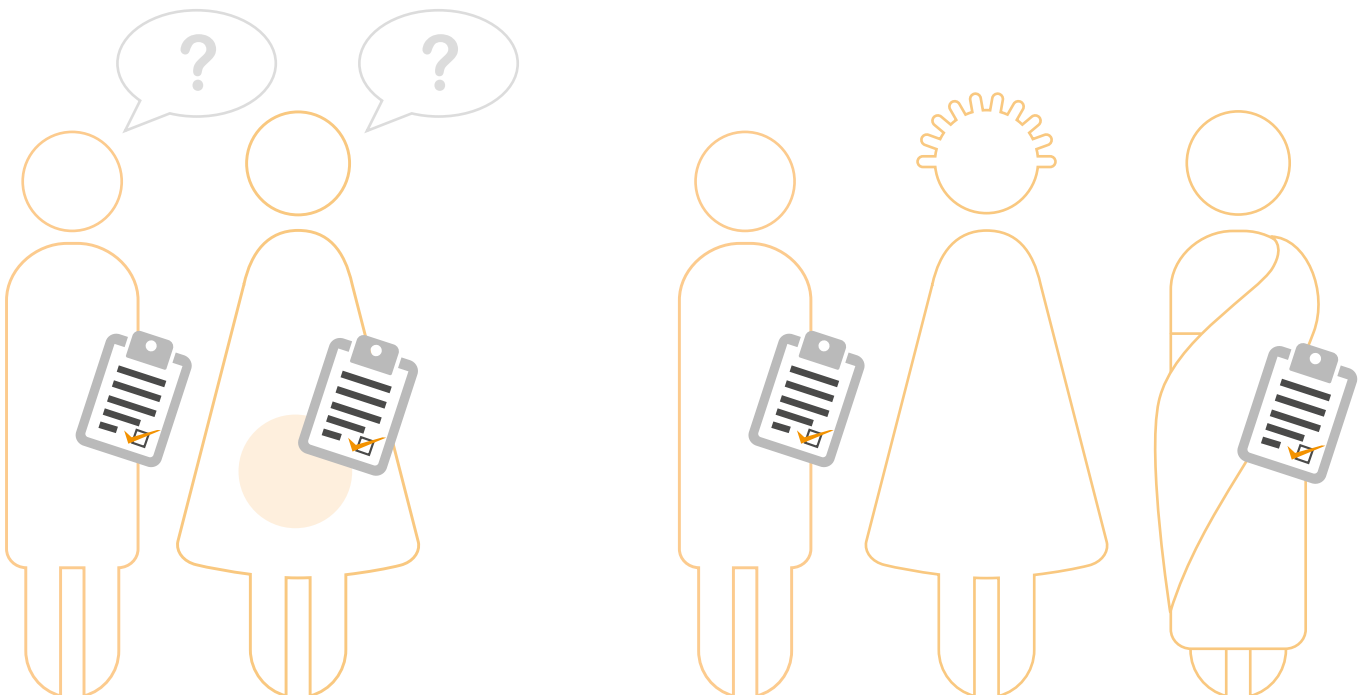
Mobile Forums and message boards can be useful for workers to express concerns, provided freedom from retaliation is guaranteed by management.

This could be as simple as creating a private Facebook page or developing a personal workplace app for workers to voice concerns. This may open the communication channel between HR/management and workers.



Gender Perspective

Allowing workers to voice their workplace issues on digital message boards allows for a closer ongoing monitoring of workplace concerns. As these tools are open year-round, problems and issues that could arise are voiced in real-time rather than recalled at the time of the audit. This gives further insight into matters raised (as they could be due to specific periods/seasons) and contributes to having a more up-to-date understanding of the workplace. However, the use of social media can also lead to counterproductive behaviours such as cyberbullying and can contribute to spreading rumours. Women who face adverse social norms may be disproportionately affected by stigmatization and may therefore also be reluctant to voice their concerns through social media platforms. Social media also raises questions around management's responsibility to address the issues' raised and of how preventing worker retaliation cases from occurring.



4.1.3 Participatory Learning and Action (PLA) Approaches

PLA is a family of approaches, methods, attitudes, behaviours and relationships, which enable and empower people to share, analyse, and enhance their knowledge of their life and conditions, and to plan, act, monitor, evaluate, and reflect. These all require the intervention of a skilled facilitator as they are based on worker interaction.

There are five PLA approaches discussed in section 4.1.3:



Diagramming /
Mapping Activities



Photo Activities



Ranking or
Scoring Tools



Story Telling/
Role Playing



Participatory
Observation



Diagramming/Mapping Activities



Diagramming/Mapping activities allow workers to assess and discuss how they see their workplace, how they feel about gender norms, what resources/facilities are available, where they can and cannot go, and what is important to them in their environment. This type of activity enables 'outsiders' to begin to see the workplace through the eyes of the workers.

Diagramming/Mapping Activities

Attitude Mapping

This tool entails reading out statements and exploring if the participant agrees or disagrees with the statement. These statements can be adapted to different workplaces practices that hold a gender component (such as advancement opportunities, recruitment/hiring practices, overtime, etc.).



Gender Perspective

This method assumes that deep-rooted attitudes toward gender roles can lead to gender-biased workplace practices. The technique is particularly interesting to better understand and position how workers feel toward norms in the workplace. This could be a relevant exercise to understand whether workplace culture is gender discriminatory, neutral, sensitive, or transformative.⁵³

Case Study

In the evaluation of a project on poverty reduction in Mahbubnagar, Andhra Pradesh, the attitude mapping method was used. The mapping was designed to assess the attitudes of women towards a range of gender and sex-related issues, such as marriage, inheritance, freedom of movement, and abuse.

Statements read to the women included:

- "Men can do household chores —cook, clean, look after children."
- "Women, like men, have a right to go anywhere."
- "Husbands have a right to hit their wives if they do not cook properly."

The attitude mapping found that women had gender-sensitive attitudes on girls' education, women's mobility, property rights, women's political participation, and a woman's right to not be hit by her partner. However, the attitude mapping also found that women held a number of beliefs that were not consistent with equal rights for women.

Source: www.isstindia.org/publications/Ranjani_toolkit.pdf

Gender Mobility and Resources Mapping

Gender Mobility and Resources mapping asks women to map facilities, products, and services, and to assess their access level over them. It is designed to show who can go where, with whom, and for how long. Furthermore, it ascertains whether access to and control over different products and services available in the workplace is equitable.

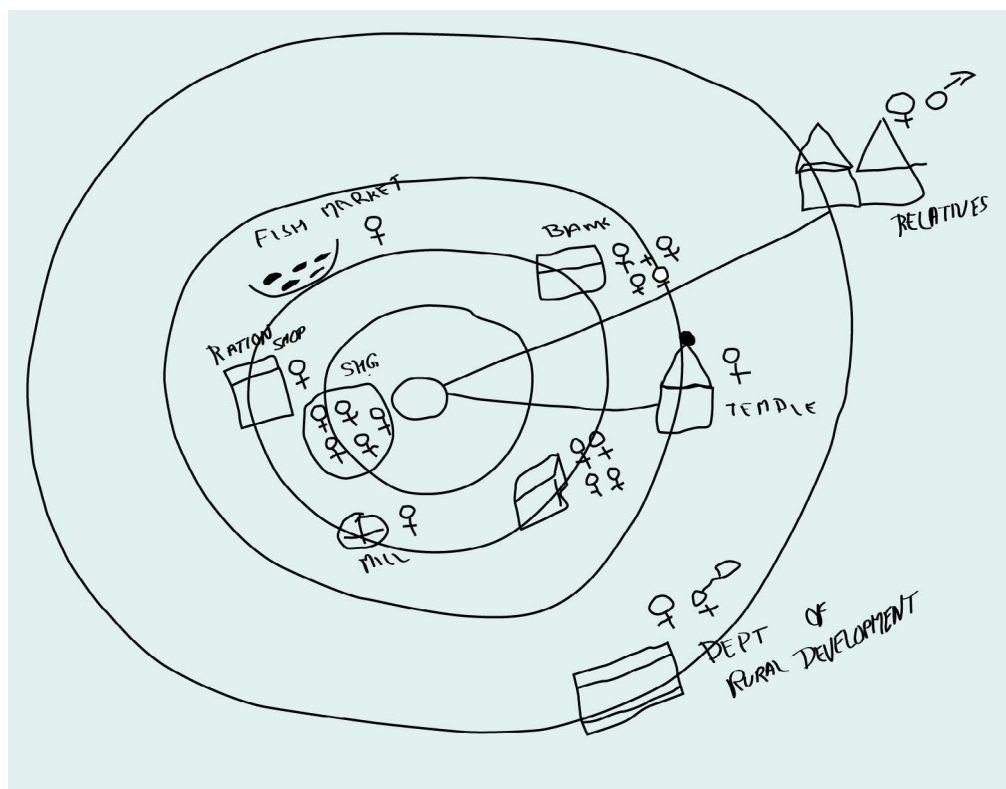
 Gender Perspective

This type of exercise can be adapted to highlight physical locations in workplaces where women are not allowed or purposely avoid, and give further insight into physical locations that hold either a threatening weight or an important gender bias that could create and/or perpetuate gender inequalities in the workplace. It may be useful for uncovering interconnections between mobility and gendered issues such as sexual harassment. It may also be useful for assessing how unpaid care work and other community duties have an impact on working hours.

Example of Process

- 1 Ask the participant to draw concentric circles on the floor with a chalk or with a felt pen on a chart paper. Each concentric circle depicts the distance from her workstation.
- 2 Ask the participant to draw important locations within the workplace she walks to, and institutions she regularly travels to, with the closest one being placed on the nearest concentric circle and in an appropriate direction.
- 3 Ask her to draw the size of the location/ institution based on how important it is to her (the bigger it is, the more important it is).
- 4 Ask her to draw a line from the centre to the location/institution she travels to.
- 5 Ask her to use symbols to indicate with whom she travels: fellow workers, friends, family, partner, group members (group), or alone.

Figure | Mobility Map Nagaualli (Agri AP Work)



Source: http://www.isstindia.org/publications/Ranjani_toolkit.pdf

Empowerment Leadership Map

Traditional circle maps (also known as Venn or chapati diagrams) show the common and distinct features between different elements represented as overlapping circles. They are used for analysis of interrelationships and power relations. Going further, the Empowerment Leadership Map looks at support networks and power relations to plan and track peer sharing.

For example, a **decision-making network** is identified by asking

“Who do you go to most frequently to get help making an important decision?”

And a **trust network** is identified by asking

“Who in this organisation do you believe has your back when things are tough?”⁵⁴



Gender Perspective

This tool can be useful in the context of assessing blockages to or support networks available for women’s empowerment within workplaces and beyond. By understanding who workers integrate in their networks, it is also possible to understand whether there could be an unconscious bias—with employees subconsciously prioritizing the views and opinions of employees of the same gender as themselves.

⁵⁴ https://gamechangenetwork.org/wp-content/uploads/2016/09/GALS@Scale_1_4_EmpowermentLeadershipMap.pdf

Figure | Example of Empowerment Leadership Map

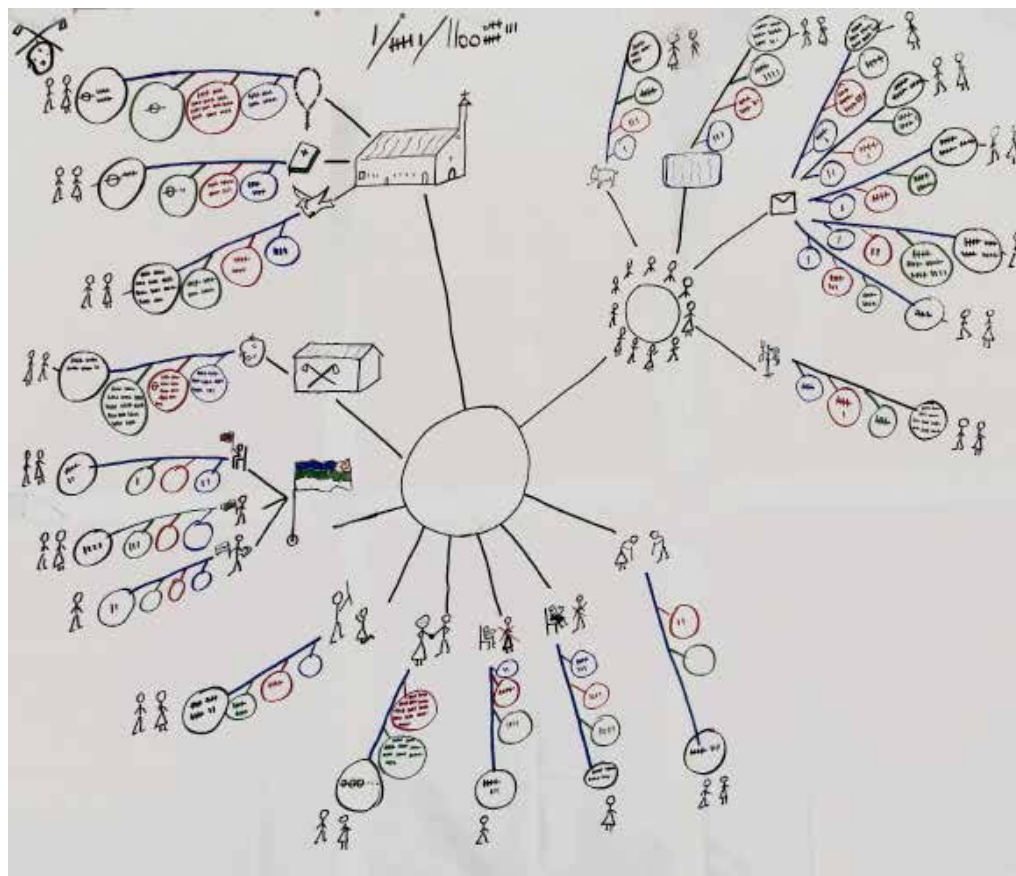


Image source: <https://gamechangenetwork.org/empowerment-mainstreaming/livelihoods-and-value-chain/>. Image © Linda Mayoux.

**Empowerment
Leadership Map
(Continued)**

Method

A sample method for an empowerment leadership map involves responding to the following questions, representing the different groups of stakeholders in a radiating diagram from the individual at the centre:

Step 1: Who am I? First draw yourself in the centre of the sheet of paper. Are you happy or sad, confident or frightened, healthy or sick, educated or not, never had the opportunity to attend school, what work do you do?

Step 2: Who is important in my life? Then draw around you the different people and institutions who are 'important' in your life, working outwards from the centre and putting those who are most important closest to you. 'Important people' are not necessarily only your immediate household or even the wider family. It could include banks or even the president.

Put men in one colour, women in another. Make sure you draw them in different colours, shapes, sizes, etc. so you can recognise them later.

Step 3: Why are they important? Now map the social/emotional relationships and economic and power relationships as arrows radiating from or to yourself, or between other people on your map. Use different colour lines and symbols for:

– **Social/emotional relationships (red):**

Who do I feel closest to?

Who do I love most, and who loves me?

– **Economic relationships (green):**

Who has money and resources—
and do they give them to me?

Or do I give to them?

– **Power relationships (blue or black):**

Who has most power? Am I frightened of them?

Step 4: What can I change?

– **What do I like and want more of?** *What are the things you really like about the situation? What do you want to increase? Mark these with 1-3 smiley faces.*

– **What do I want to change?** *What are the things you really don't like about your situation? What do you want to change? Mark these with 1-3 sad faces.*

Step 5: How can I change it?

– Who do I want to help?

– Who do I need to change?

Source: www.galsatscale.net/_documents/GALSCatalyst4EmpowermentLeadershipMap.pdf

Roadmap

Roadmaps entail asking the participant to draw a road connecting two circles, with the present level of constraints and obstacles being depicted in a circle at the beginning of the road and with their professional dreams and ambitions being depicted in a circle at the end of the road. Roads can be ascending (if there is improvement), descending (if there is deterioration) or straight (if there is no change).

It can be a straight path (if change is in one direction) or curved (if there are improvements and deterioration). Roadmaps also entail tracking reasons for improvement or deterioration, which are drawn/written on the road itself.

 Gender Perspective

This type of exercise can be especially useful to understand the discriminatory factors at play during the recruitment and career advancement, for instance, and how each step affects women workers in particular. It can be used with both men and women to understand the challenges and opportunities they experience in the workplace and the gender norms more broadly.

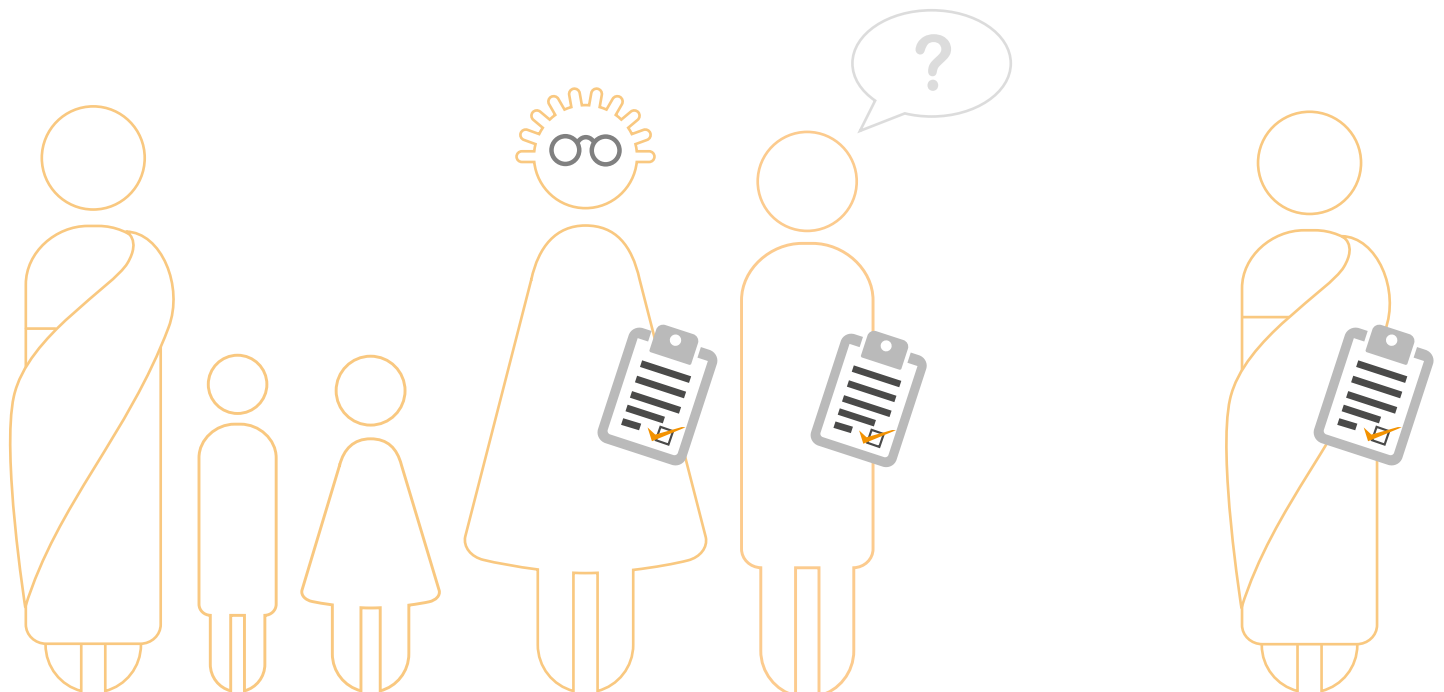
Case Study

One case study of a gender-sensitive roadmap concerned a thirty-year-old woman leader of a group in Mymensingh district, Bangladesh. She lives with her father-in-law, husband, and two children.

Her roadmap was an ascending one. She shared that she and her husband were landless, but her father-in-law, who stayed with them, owned four acres of land. Before joining a group, formed in 2005 under the Microfinance for Marginal and Small Farmers Project, the household could not cultivate all four acres as they did not have access to microcredit for purchase of inputs. Now they cultivate all four acres of land, and the land in low areas is sown twice. She and her husband have built their own house.

The roadmap was therefore ascending as the household poverty had reduced and there had been some progress towards empowerment. However, the woman's escape from poverty continues to be contingent upon her being in the institution of marriage.

Source: www.isstindia.org/publications/Ranjani_toolkit.pdf



Gender Balance Tree

Trees start from a trunk representing an issue or an institution like a household, a community, or a workplace. Inputs are then shown as roots and outputs as branches.

In the Gender Action Learning System (GALS), trees also have fruits or concrete action commitments. They may also have circular linkages from branches to roots to show cycles of cross-fertilisation. The Gender Balance Tree identifies gender inequalities in work contribution and expenditure benefits in the household/workplace and the changes needed for gender balance to make the tree grow straight.

The tool produces credible quantification of the serious imbalances by participants themselves, rather than vague estimates of what people already know. This can convince community leaders or employers to act.

 Gender Perspective

This tool can be helpful in raising awareness about pay inequalities and unpaid care work challenges, and the impact on women's involvement in the labour workforce. It could also support the identification of workplace gender imbalances overall, from recruitment to promotion and overall working conditions. This exercise may also be used with supplier management.

Case Study

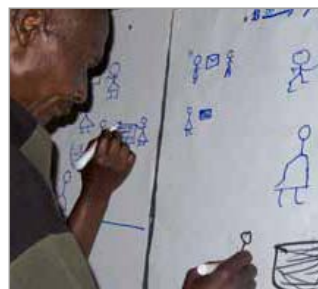
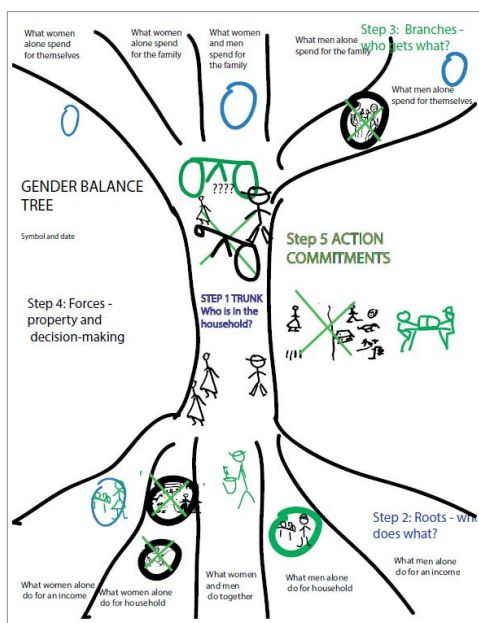
Oxfam found that the tree “proved effective at highlighting the frequency of gender imbalance whereby women do most of the work but men control and spend most of the income. For women, the burden of unpaid household work and lack of control over income from their income-earning activities prevents them from increasing their economic efficiency, using income for productive investment or their own or household well-being.

For both men and women gendered norms of behaviour and peer pressure (e.g. male alcoholism) may often prevent them from using income productively. Many men have been surprised to realise just how much work their wives do, and how much money they themselves waste, which could be used productively or to help their family.”

Source: [www.oxfamnovib.nl/redactie/Downloads/English/SPEF/140701_RRDD_manual_July_small\(1\).pdf](http://www.oxfamnovib.nl/redactie/Downloads/English/SPEF/140701_RRDD_manual_July_small(1).pdf)

Image source (below): <https://gamechangenetwork.org/empowerment-mainstreaming/livelihoods-and-value-chain/>. Images © Linda Mayoux.

Figure | Gender Balance Tree



Diagramming/Mapping Activities

Gender Justice Diamonds

This tool is useful to explore, identify, and compare women's and men's criteria for gender justice and/or empowerment and/or gendered perceptions of wealth and happiness. The issues identified can be ranked and prioritised as issues for individual, collective, and organisational action.

Sample Process

In one documented study for the creation of a Gender Justice Diamond, participants are asked, "What do you think are the three best/worst aspects of being a woman or a man, focusing particularly on issues in the value chain? This could be issues in the household that affect your economic activities, in relationships with other actors and/or institutions in the chain."

Everyone then places these different elements onto a diamond shape, where the top represents positive aspects and the bottom represents negative aspects. The group then votes on the different elements, deciding where to rank them and how to group them.

Source: gamechangenetwork.org/wp-content/uploads/2016/09/GENVAD_2015final_comp.pdf

Figure | Gender Justice Diamond



Image source: <https://gamechangenetwork.org/diamonds/>. Image © Linda Mayoux.

Photo Activities



Photo Activities allow for the capture of certain details of reality in a particular way. A photograph is not necessarily an objective record of fact but is rather evidence of what matters to the photographer. The ability of photography to record reality is still an important strength when it comes to conveying information about an issue.

Photo Activities

Photo Voice

Photovoice is a longer-term exercise that asks participants to take pictures that express their perspective on, views about, and feelings on a topic. The topic, for example, can be “Things that hinder you from being productive” or “Things that help you to work.” Participants are then given a camera and a specific time period to take the photos, which are then printed, and participants select a couple of images to use as a stimulus in a group discussion.

Discussion focuses on why the photographs were chosen, what makes them meaningful, and what participants think about each other’s pictures. Generally, pictures can then be shared with management in a photo display workshop, which opens the dialogue between participants and management.

Case Study

In one study conducted among university custodians, the photo voice process was used to assess workplace health and safety. The results were visual depiction of hazardous tasks and exposures among custodians and management focusing primarily on improper or unsafe equipment, awkward postures, lifting hazards, and electrical hazards.

The process of taking pictures and presenting them created an ongoing discussion among workers and management regarding the need for change and for process improvements, and resulted in greater interest and activity regarding occupational health among the workers.

Source: www.ncbi.nlm.nih.gov/pmc/articles/PMC2957512/#R12



Gender Perspective

This type of exercise would provide a good basis for women workers to highlight the barriers and obstacles that impede or hinder their work satisfaction on a day-to-day basis in a way that may feel less threatening than voicing them directly without any props to a wider group. For this exercise to work, women must feel comfortable enough to take pictures in the workplace. Moreover, as gendered issues are not necessarily immediately visible, it is important to encourage women to take pictures of elements that may symbolically represent the issue at stake. However, care must be taken, as management may find the exercise of capturing photo evidence of the workplace particularly threatening, especially for IP and confidentiality purposes.



Ranking or Scoring Tools

Ranking or Scoring Tools provide a way for activity participants to weigh/rate/prioritise items or issues either relative to one another or according to criteria.

Ranking or Scoring Tools

Ranking Tools

A ranking exercise asks workers (as a group) to prioritise and rank challenges and opportunities. Often, these exercises involve the creation of a matrix and could be utilized in the workplace to gauge women workers' understanding, opinion, or prioritisation of issues.



Gender Perspective

This is a valuable tool as it can be adapted to suit a number of distinct purposes and time constraints:

- Assessing the understanding/prioritisation of a pre-established list of issues/actions in order of salience or importance to women workers (skipping the brainstorming stage)
- Letting women identify the issues that are most material to them at the brainstorming stage and gauge their understanding of these before asking to rate them.

In option b), the brainstorming stage needs to be carefully facilitated for women to freely raise the issues of true concern to them.

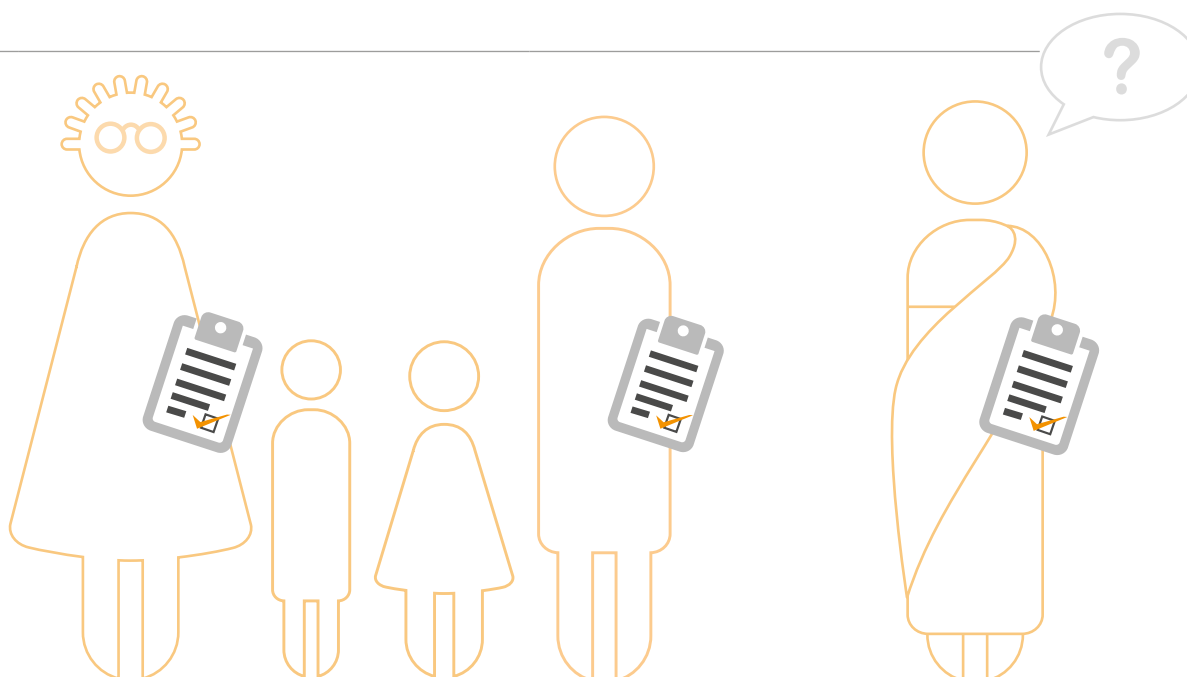
Case Study

In the course of BSR's HERproject, a ranking tool was used with six male farm workers in Naivasha to collect baseline data on their health needs.

The participants revealed new health concerns that had not been expected or identified by the facilitators before (such as stress). For other concerns, the extent to which they impacted the participants had not been captured before (such as joint pain).

The activity exposed knowledge gaps and misinformation among the participants (men thought tuberculosis came from cold weather or smoking). The activity also identified how current resources and services on the farm and in the community did not match needs (while most available programming focuses on worker safety or HIV/AIDS, men want more information on stress and joint pain, and options for treatment).

Source: herproject.org/files/toolkits/HERproject-Participatory-Learning.pdf





Story Telling/Role Playing

This is an approach used to capture gender-sensitive issues. It entails identifying a culturally appropriate story which highlights discriminatory practices, and then asking the participants whether they identify with the character who is discriminated against in the story.

Story Telling/Role Playing

Story Telling Workshop


Performed with a group of workers, these workshops entail narrating an appropriate story touching upon sensitive subjects such as discrimination, for example asking participants whether they ever felt like the discriminated person/ animal in the story.

The continued metaphor throughout the workshop highlighting the fictive scenario allows the facilitator to keep a safe distance between participants' real stories and the narrated story, whilst simultaneously gauging the feelings and experiences of the participants.



Gender Perspective

Engagement methods based on story telling can be an effective way to enable women workers to be open about the issues they face. When the story is depersonalised and the associated stigma thereby neutralised, workers are more likely to react and share their own thoughts and insights about their own personal experience or the experiences of other women they know.



“ Even though quantitative and statistical data derived from surveys is a valuable resource evaluation cannot be only survey-based, where respondents are fed with information and they have to choose from the preconceived notions of the researcher. Giving voice to people brings to the forefront details we would never have thought of since we are to a large extent removed from cultural realities of the group or community being surveyed.

Source: <http://www.the4thwheel.com/Storytelling4Evaluation.pdf>

Story Telling/Role Playing

SenseMaker

SenseMaker is a narrative-based research methodology that captures and analyses a large quantity of stories in order to understand complex change. Together, the stories create a nuanced picture of a given topic, in the same way that many pixels come together to produce a clear image.

This tool can assist with early recognition of weak signals of changing social dynamics. It can unearth hidden issues and can be used for the identification of emerging or outlier factors that deviate from normal trends and patterns. The open-ended nature of the prompt allows storytellers to share stories of their own choosing and enables researchers to collect narratives on the same topic from a variety of perspectives.



Gender Perspective

Unlike a traditional questionnaire or survey, the SenseMaker methodology does not decide in advance what topics women should talk about, or what aspects of those topics were the most important. Instead, respondents are asked to tell a story on any topic. The SenseMaker approach may encourage women to share stories of abuse and sexual harassment that they may conceal in the context of a standard interview or audit.

Case Study

The Ethical Trading Initiative (ETI) and Oxfam set out to better understand the working environment in the Better Strawberries initiative, which was set up to help supermarkets and food retailers address labour issues occurring in their Moroccan supply chains. To do this, they used SenseMaker.

They asked workers to tell a story of their choice, with the only requirement that it be work-related dealing with something they thought should change.

They then asked each woman strawberry worker questions about the story. What is it about? Who was involved? Was it negative or positive? How did it make you feel? Did the people involved have the will and/or the power to change things?

A large proportion of the stories were about verbal abuse and sexual harassment. Many of the stories were also about physical harm at work.

ETI and Oxfam were already aware of the accidents women suffered on the overcrowded trucks that labour providers use to drive workers to and from villages. However, they did not know as much about the lost pay because of the frequency of such accidents, or how rarely women were helped with medical costs. They also learnt about accidents at work, many of them involving injuries caused by falling pallets.

Source: www.ethicaltrade.org/blog/international-womens-day-what-moroccan-women-workers-really-really-wantand-feel

Participatory Observation



This is an approach used by anthropologists and sociologists. The approach consists of the assessor joining a group as a participating member to get a first-hand perspective of the group and their activities. Instead of observing as an outsider, the assessor plays two roles at once—objective observer and subjective participant.

Ranking or Scoring Tools

Transect Walk

A transect walk is a systematic walk along a defined path (transect) across the relevant space with the concerned individuals.

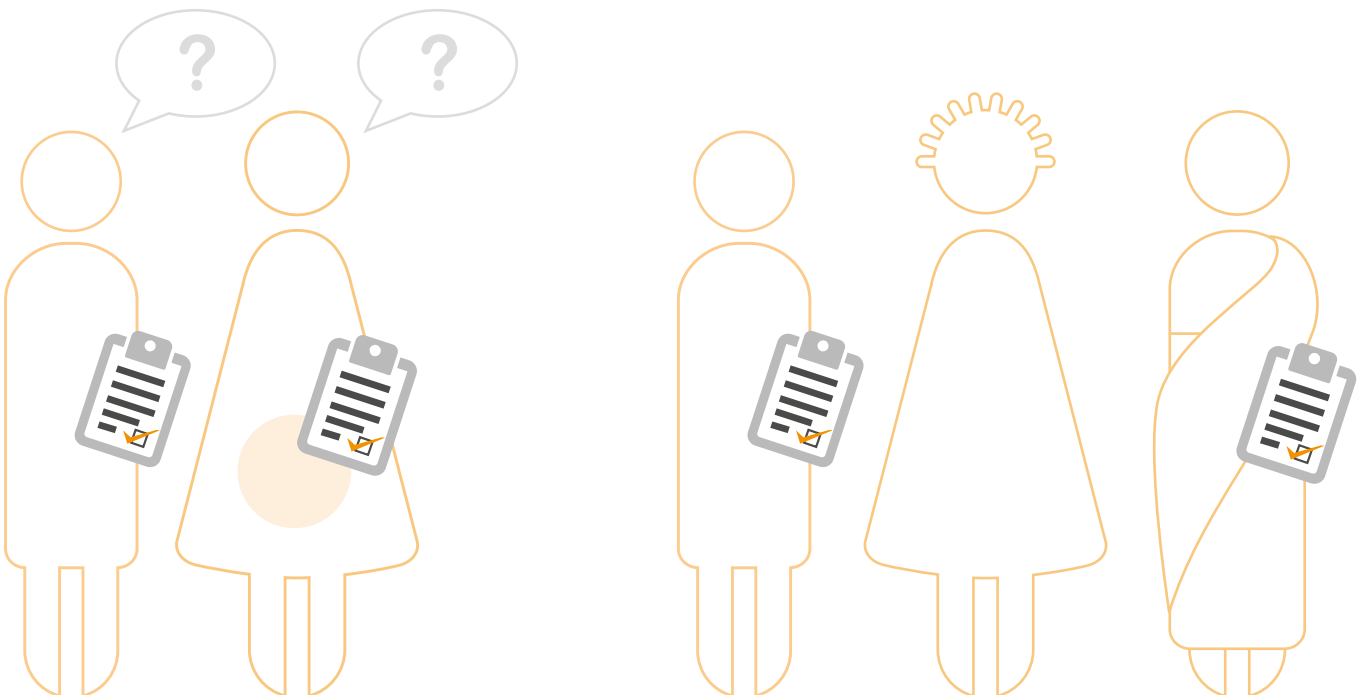
In relation to audits, this means walking through the working and/or living areas on the worksite, calling upon women to share their insights into the diversity and differences that exist among groups in the workplace. Among other purposes, the transect walk serves to cross-check the verbal data collected.



Gender Perspective

The walk can serve as a “listening survey” to get a deeper understanding of the social relations, attitudes, and gender norms in the workplace. Furthermore, it can help women workers expand on or highlight certain subjects that might have come up both in SSIs and FGDs and that are of particular concern to them. The exercise can specifically build confidence in female workers’ capacity to successfully participate in the auditing process.

Source: www.ids.ac.uk/files/dmfile/Wp237.pdf



4.2 Perspectives on Worker Engagement Tools and Social Auditing

The tables below highlight the main benefits and drawbacks of the two most commonly used alternative worker engagement approaches: Worker Voices Surveys and PLA.

Worker Voices Surveys

Benefits	Drawbacks/Risks
<ul style="list-style-type: none"> ■ Anonymous feedback: may provide more candid responses ■ Questionnaire can be customized to assess women's specific needs and issues ■ Data disaggregated by gender ■ Time and cost effective ■ Easy to compare results/progress ■ Easy to scale up ■ Better suited for quantitative data collection 	<ul style="list-style-type: none"> ■ Anonymous feedback: cannot be used to follow up on specific cases ■ Analysis of collected data needs human intervention ■ Access to technology is limited for women ■ Responses may be biased as no opportunity to clarify meaning of questions ■ Questions are predetermined ■ Success depends on quality of the questionnaire ■ One-way communication channel

PLA Approaches

Benefits	Drawbacks/Risks
<ul style="list-style-type: none"> ■ May provide insights into solutions ■ Worker-led ■ Flexibility: can be adjusted to worker interaction ■ Allows for deeper root cause analysis ■ Has the potential to collect cues and insights on broader societal context ■ Two-way communication channel (especially when integrating management into focus group) ■ Better suited to qualitative data collection 	<ul style="list-style-type: none"> ■ Relies on good facilitation skills ■ Answers may be influenced by others/context ■ Outputs need to be translated into digestible information, relying on the analytical skills of the facilitator ■ Relies on active participation of women workers ■ Does not lend itself to comparative purposes ■ Complex to scale up



It is vital to assess the practical implications of integrating these tools into existing social auditing processes. The mapping conducted on the next page provides an assessment of the potential for integrating the technology-enabled solutions and the PLA tools within the social auditing process based on five criteria:

- Whether these tools have already been trialed in the workplace
- Whether they can be integrated within the time constraints of a traditional audit
- Whether they require substantial additional resources/or logistical adjustments to be implemented
- What type of data these tools are more likely to yield
- What type of additional competence or external intervention is needed

Opportunities and Challenges for Integration of Worker Engagement Approaches in Social Audits

Approach	Tool Category	Tested*	Time Allocation:**	Resources and/or Logistics†	Type of Data Gathered ‡	Other Requirements
Technology Enabled Solutions	Hotlines			Additional costs	Qualitative	External intervention/provider
	Surveys		Traditionally no, but potential exists (see Labour Link/Elevate case study)	Additional logistics and costs	Quantitative and qualitative	External intervention/provider
	Social Media			Additional costs and resources to monitor app	Qualitative	May require external service provider
Participatory Learning and Action (PLA) Approaches	Diagramming and Mapping Activities		Some can be more time consuming than regular interviews		Qualitative	Requires enhanced facilitation skills
	Photo Activities			Additional logistics and costs	Qualitative	Requires enhanced facilitation skills
	Ranking/ Scoring Tools		Can be time-consuming depending on scope of exercise		Qualitative and quantitative	Requires sufficient facilitation skills
	Story Telling			Additional costs for SenseMaker but not for Story Telling workshops	Both quantitative and qualitative for SenseMaker	Requires enhanced facilitation skills/External intervention/provider (for SenseMaker)
	Participatory Observation				Qualitative	

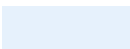


Notes: *Tested: Has it been piloted in the workplace before?

**Time Allocation: Can it be conducted in the time constraints of a typical audit?

† Resources and/or Logistics: Does it require substantial additional resources or logistical adjustments to be implemented?

‡Data can be qualitative and/or quantitative

Legend

	Easy to implement
	Feasible with implications
	Difficult



Strengthening Worker Voice in Social Auditing

The greatest constraints to integrating a stronger worker engagement element into current social auditing practices are time and cost, which are related factors. In addition, the notion of strengthening the worker voice aspect within auditing raises questions of how to:

- **Effectively collect insights**, including remediation suggestions to workplace issues that do not necessarily fit into the non-compliance, observation, and good practice framework of the current reporting format. Handling a vast amount of data (qualitative and quantitative) from a variety of sources also represents a challenge for a majority of companies (and even more so for suppliers), from the collection and analysis of the data to the design or course-correcting of programmes informed by it.
- **Engage workers more proactively** in the auditing process and beyond to put in place “ongoing monitoring” and proactive worker-led remediation.
- **Shift to a more supplier-centric model**, where the (mature) supplier is empowered to take up its own worker engagement model as a business priority, moving away from a top-down compliance approach.

Integrate within, Complement, or Replace Social Audits?

From the previous mapping we can draw the following conclusion: Some methods may be used to improve the collection of insights during the course of a social audit exercise by improving the way information is collected or the way a site is observed by auditors. Other methods rely on anonymous external channels that can provide helpful insights but cannot be fully integrated into the social audit report findings as these would be categorized as anonymous uncorroborated findings.

Participatory Learning and Action approaches have the highest potential for being effectively integrated into current audit approaches, with the objective of enhancing the effectiveness of the existing worker interview process and collecting better worker insights. PLA approaches transform the “investigator” into a “facilitator” and can break the power barriers between facilitators and workers. Some specific tools can be integrated without the need for considerable logistical and competency adjustments, such as the Transect Walk and the Attitude Mapping. The latter is currently used in HERproject workplace needs assessment in factories and farms (see case study on following page).

When considering the integration of more complex PLA approaches within the auditing process, however, it is important to train auditors to facilitate these types of exercises. Successfully running storytelling or issue-ranking workshops, for instance, requires strong facilitation and people skills, which are not currently part of the mainstream auditor training curriculum. It also requires the facilitator to be aware of the complexity of gender and social relations, and the economic and local context in which they are being shaped. Some of the diagramming tools such as the journey and the tree diagrams may also prove useful in raising awareness and engaging supplier management (and not just workers) on gender norms in the workplace and their impact on the business. This will help prepare the ground for corrective actions on the topic.

The format of audit reports, which currently focuses on capturing non-compliance, observations, and some good practice examples, should also be amended to capture the wealth of contextual gender equality information that may result from PLA activities.

Technology-enabled solutions such as mobile or tablet surveys may be integrated into the process of auditing in real time and may provide some useful insights into workplace norms and issues (see case study p.133). However, the full integration of survey results into non-compliance reporting presents some challenges, including the fact that non-compliances must be based on corroborated findings, which excludes survey result findings.

In some cases, it may not be practical or advisable to integrate certain approaches into the auditing process itself. These specific approaches may nevertheless be used outside of the process, either as part of the preparation of an audit or as a complement to the insights gathered by an audit.

- For instance, in addition to consulting with local women’s organisations, NGOs, or trade unions that will be able to provide general context on gendered issues of local communities, a technology-enabled survey (specifically designed to assess gender norms) can be effective at gathering more detailed information on specific workplaces to better target the audit.
- Approaches such as storytelling workshops and SenseMaker would be better implemented outside of an audit. They could be considered as a complement to or even a replacement of an audit or follow-up audit, depending on the maturity and level of engagement of the supplier.



HERproject's Baseline Assessment: Attitude Mapping

Understanding the complexity of social gender norms is vital for effectively apprehending violence and harassment in the workplace. Measuring the effectiveness of an intervention in changing social norms in a specific workplace is equally important to demonstrate the impact achieved. However, social norms are quite difficult to measure.

Although caution is advised when trying to measure gender norms, behavior and attitude can be evaluated. HERproject uses attitude mapping when conducting baseline, midline, and end line surveys to inform, review, and measure the impact of its workplace programmes on shifting gender norms. The surveys assess workers' attitudes and behaviour when confronted with specific situations. HERproject needs assessments will typically ask workers if they agree or disagree with the following statements (using a 4-point scale: strongly agree, agree, disagree, strongly disagree) to gauge workplace culture:

- "I think that if a female/male worker does something wrong, their supervisor has the right to punish them"
- "A female/male worker should tolerate harsh discipline in the workplace in order to keep their job"
- "A man should have the final word about decisions in his home"
- "Men deserve more respect than women"
- "My community believes that a woman should always obey her husband"

HERproject's midline survey from a pilot in Bangladesh showed a decrease in the acceptance and normalization of violence at home and at work. We also observed an increase in gender-equal attitudes and a greater sense of personal responsibility to stop violence against women, e.g.:

- The percentage of participants agreeing that there are times a woman deserves to be beaten decreased from 54% to 1%.
- The percentage of participants agreeing that they have a responsibility to stop violence against women increased from 4% to 99%.
- The percentage of participants agreeing that childcare is the mother's responsibility decreased from 43% to 13%.





Case Study

Attitude Mapping: Measuring Opinions on and Experiences of Emotional, Physical, and Sexual Violence

Survey Question

A 23-year-old woman works in a BPO in a city. Her working hours are from 3pm to 11pm. On the way back home, an office shuttle drops her off at her house along with some other colleagues. As required by company policy, she wears a formal skirt at work. The woman thought that traveling with her colleagues in official transport would prevent any harassment while commuting to and from work. One day while returning home, the office shuttle did not arrive and the woman took a cab along with another male colleague. The cab driver and his assistant sexually harassed the woman after beating up her friend.

Answer the following questions based on the above incident: Do you agree that the woman was responsible for the incident?

Which of the following do you agree with?

[Mark all that apply. Read out the options]

- The woman was not responsible in any way.
- The woman chose a job which kept her out of home late at night.
- The woman's dress was provocative.
- The woman was accompanied by a man who was neither her husband nor a relative.
- The woman should have been more careful about choosing the cab.
- Don't know.

What do you think the woman should have done after the incident?

How do you think such incidents can be reduced?

[Mark all that apply]

- Women should avoid working during these hours.
- Families should restrict women from wearing dresses and skirts.
- Families should restrict girls from remaining away from home late at night.
- The government should increase punishments for the guilty.
- The government should conduct awareness campaigns to promote gender equality.
- Don't know.

Suggested Responses

- 1 = Strongly agree
- 2 = Agree
- 3 = Moderately agree
- 4 = Disagree
- 5 = Strongly disagree
- 6 = Don't know

0 = Disagree

1 = Agree

1 = Report to the police, media, women's group

2 = Report to family and let them make the decision

3 = Keep the matter private

0 = Disagree

1 = Agree

Source: <https://www.povertyactionlab.org/sites/default/files/resources/practical-guide-to-measuring-women-and-girls-empowerment-appendix1.pdf#page=51>





Integrated Assessment + Worker Survey: An Anonymous Channel to Surface Sensitive Insights

ELEVATE is embedding award-winning Laborlink mobile technology into its assessment approach to offer an anonymous channel for all workers, including women, to share their experiences with their employer and its customers. The Laborlink team found as much as nine times greater disclosure on sensitive topics via mobile, compared to in-person interviews or live operators via call centre.

ELEVATE's Integrated Assessment + Worker Survey approach starts with a 17-question survey that covers basic demographics, including gender, and specific questions about harassment, fair pay, and special protection for pregnant women. For example, "Has a co-worker or superior made unwelcome sexual remarks or physical contact toward you or others in the past 12 months?"

Without adding any time to a standard audit, auditors spend no more than one hour giving workers instructions on how to participate in the anonymous mobile survey. Workers have 48 hours to respond using their own phone, and insights are included with the final audit package delivered to customers, and increasingly to factories, to leverage worker insights to create factory improvements.

The approach has been tested at over 200 facilities in China, India, Bangladesh, and the U.S., and is being integrated into every audit conducted by ELEVATE in China, with plans to expand globally across ELEVATE's global audits (approximately 14,000 conducted annually).

With these new insights from women in the supply chain, suppliers can take more targeted measures to address their needs, and buyers have a more reliable understanding of the issues affecting women in different regions to inform strategies on risk and capacity-building.



A “One Tool Fits All” Approach?

Over the years, companies have expressed frustration with social audits as their primary supply chain monitoring tool, yet the transition away from audits has been delayed as companies have struggled to identify practical, measurable, and scalable solutions that provide better information and drive supplier improvements. For years companies have invested in the development and improvement of their management systems mechanisms around social audits, from identifying KPIs that enable monitoring and measurement of improvements (including benchmarking between suppliers) to linking audit results to score cards and procurement decisions. These systems and metrics have not yet been systematically developed for alternative approaches, which is necessary if companies are to test and assess the effectiveness of other approaches compared to social audits in driving improvements.

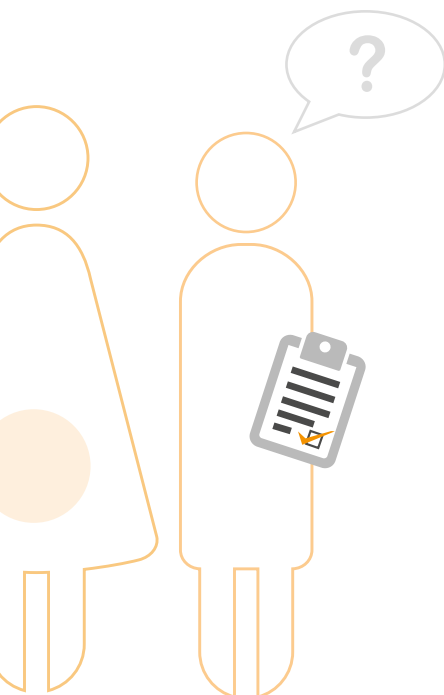
If other approaches are to be embraced across an industry, industry players need to invest in demonstrating impact at a large scale. This can happen only if a critical mass of companies starts shifting their strategies and budgets towards a diversified approach to monitoring social issues in supply chains. Considerations must be given to managing this gradual transition within companies, as this shift could also be accompanied by a sizable drop in responsible sourcing budgets. Funds may not necessarily be re-allocated to impact-focused approaches, including alternative worker engagement tools.

A “one tool fits all” approach may not be the best way forward for monitoring issues and driving progress on gender equality in companies’ supply chains. The chosen approach will depend partly on the company’s primary driver, which may range from solely managing business risk to embarking on a more transformative journey with its suppliers, addressing in a more genuine fashion the risks to and the needs of workers.

Different strategies should also be considered depending on the types of suppliers and their degree of maturity. Current audit approaches focus on assessing the existence of policies, processes, or mechanisms but are not yet geared to effectively evaluating their effectiveness and impact on workers.

Incentives should be factored into the supplier monitoring approach: the more mature suppliers are, the less policed and the more accountable for their own workforces they should be.

- **For high-risk suppliers**, an enhanced traditional compliance approach still has a role to play. Worker surveys are more likely to be used as an occasional complement to the traditional improvement process to ensure that no high-risk issues have been left unaddressed.
- **For better performing low-risk suppliers**, companies may find it easier to gradually replace the audit exercise all together, using other types of systematised worker engagement approaches. These approaches may also provide companies and their supplier with a different perspective. Companies may wish to use this approach as a way of building trust with their lower-risk factories, gradually diminishing the need for regular compliance-focused audits and encouraging supplier ownership over the management of their own factory’s working conditions. As a part of this, suppliers may use worker engagement results as regular feedback to spur meaningful changes.
- **For advanced suppliers** who have achieved a certain degree of transparency, maturity, and ownership of workplace issues and who are able to develop a more holistic and progressive view of workplace management, Participatory Learning and Action approaches may be favoured, potentially serving as a full replacement for traditional auditing. The benefits for the supplier of a shift towards worker engagement approaches can be fully reaped only if other buyers undertake the same shift. Otherwise, existing audits will still be required by other customers, and the supplier will perceive the PLA as an additional burden.



Recommendations

- Voluntary initiative and certification schemes should review their auditing methodologies to integrate specific requirements on approaches for gathering worker voices, ensuring women's voices are represented.
- Auditing companies should consider how to best integrate, adapt, and systematise some of the PLA tools when conducting focus group discussions during social audits to gather insights on gender norms and specific issues.
- Auditors should receive additional training on the specificities of PLA approaches and on facilitating techniques to encourage them to naturally opt for focus group exercises (versus individual interviews). This training should be a core part of the auditing training curriculum.
- Companies should consider diversifying their strategies for monitoring supply chains by using different tools at different stages of the improvement process and by adapting approaches to the maturity of their supplier base.
- Companies should encourage their more mature suppliers to take up worker engagement models as a business priority, independent of their clients' expectations.
- Worker engagement approaches should focus their efforts on demonstrating impact and cost effectiveness at scale if they want to be considered as a viable alternative to social auditing.



Conclusion

There are several direct interventions that can transform the existing auditing process from within and enhance its ability to identify and understand gender considerations. These range from integrating more specific gender verification measures across the audited areas to improving the worker interview process, including through the currently-untapped Participatory Learning and Action (PLA) approaches.

These changes— including those needed to address the more structural barriers to improving the gender sensitivity of auditing, such as improving auditor knowledge and competence or identifying the best mechanisms to capture and report some of the most sensitive issues—should be pushed collectively by all actors of the social auditing ecosystem. From standard setters to accreditation services, from auditors to auditing industry associations, from companies to suppliers, all have a crucial role to play in transforming the effectiveness of the system in addressing and remediating gendered issues.

Regardless of gender, when social audits are used, they should always be part of a diversified approach to risk management and transformational change, with workers at the heart of the process. Depending on supplier types, alternative worker voice approaches may be favoured to identify and provide valuable insights on how best to address women-specific issues. In some cases, this may be in addition to standard audits, and in others it may be as a straightforward replacement. More thought should also be given to strategies that contribute to successfully shifting interest in and ownership of workplace improvements from companies to suppliers, and to the adequate use of audits and other alternative tools (including self-reporting tools) within this emerging accountability shift.

Transparency has become civil society's favoured alternative solution to traditional monitoring. It is said to aid accountability, on the basis that when issues are identified and shared publicly, responsible stakeholders are more easily held to account and encouraged to address these in a timely manner. It is also said to be a good mechanism for putting the spotlight on issues that are most commonly left in the dark (of which gender equality is one). As more companies embrace supply chain transparency and begin publicly listing supplier information, the monitoring paradigm may begin to shift from less confidential company monitoring to more open public monitoring. Factory disclosure may make it possible for companies to receive credible information directly from worker rights advocates and workers themselves, provided women workers are empowered enough to voice their concerns.

However, while transparency may transform the current accountability dynamics and push companies and suppliers to take ownership of the issues that affect their workers, it will not fix the issues by itself. Transparency may be a means to change but it cannot realize the change on its own. The need for companies to partner with suppliers and engage their women workers directly to shift workplace practices and play their part in disrupting gender norms will remain. In this context and beyond compliance, worker engagement tools and approaches remain central in co-creating workplace solutions that address the needs of and benefit both women and men workers.

Appendix

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Weblinks accessed 6 September 2018

Layout by Alex Rhind.





About BSR

BSR is a global nonprofit organization that works with its network of more than 250 member companies and other partners to build a just and sustainable world. From its offices in Asia, Europe, and North America, BSR develops sustainable business strategies and solutions through consulting, research, and cross-sector collaboration. Visit www.bsr.org for more information about BSR's 25 years of leadership in sustainability.