

Guidance Note 5: Risk Assessment

This note provides a framework for undertaking risk assessments on gender-based violence and harassment (GBVH) and can be implemented by companies as part of human resource management, procurement, purchasing, and sourcing, supply chain management, client and customer management, and subsidiary management. The risk assessment conducted in this area should be integrated into existing risk management frameworks, for instance, in occupational health and safety risk assessments or environmental, social, and governance risks assessments. This risk assessment can also be utilized as a response to incidents of GBVH to uncover its root causes.

This guidance assumes a basic four-step process for risk management:

- 1. Identify risks:** The first step in risk management is finding the salient GBVH risks – these risks may be identified based on existing issues related to GBVH or emerging risks in operations.
- 2. Develop a risk management plan:** The second step is to create an action plan to mitigate potential risks.
- 3. Monitor risks:** The next step is to monitor GBVH-related issues and the effective implementation of the risk management plan.
- 4. Review risks:** The last step is to compare the actual risks (vis-à-vis the data collected in step three) and the anticipated risks (step 1) to revise the risk management plan to better respond to emerging risks.



1. Identify risks

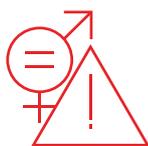
Identifying risks encompasses two steps. First, a company should understand the **GBVH risks** related to GBVH. Second, a company should assess **operational risks**, which looks at the company's ability to mitigate the risks based on its current policies, processes, and systems in place.

1.1. GBVH risks

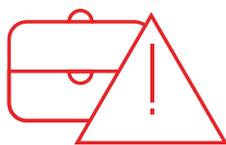
Companies should consider the potential risks of GBVH in its operations and through its business relationships (i.e. procurement, purchasing, sourcing, supply chain management, subsidiary management, and client/customer management).

To begin this process, companies should ask the following questions:

- What are the forms of GBVH in our operations?
- How often do we encounter these forms of GBVH occurring? How likely are these incidents going to happen?



Discrimination and gender inequality risks: Inherent discrimination or gender inequality risks exacerbate risks of GBVH, which disproportionately affects employees based on their identities and social factors on the basis of gender, sexual orientation, age, ability, ethnicity, migrant status, linguistic group, and other factors. This increases the risks of GBVH in a sector where the majority of the workforce is made of young women under the age of 25 particularly young migrant women.



Business model risks: The structure of a company's business model. At the factory level, piece-rates are associated with high pressure environments, especially in cases where supervisor incentives rely on the production rates of line workers. In supply chain, client/customer, and subsidiary management, the leverage and influence a company has with its business partners can affect their ability to mitigate upstream and/or downstream risks.

As part of this first step, companies should engage workers, particularly from groups that are at disproportionately at risk of experiencing GBVH, workers' representatives and trade unions, non-profit organizations, and/or external experts to identify these risks.

- Are there specific groups of persons who are more at risk of experiencing GBVH?
- Are there certain areas in our operations where we are more likely to find GBVH?
- How severe are the impacts of GBVH on the affected persons?

Based on research and Better Work and CARE International's experiences, several factors are known to drive GBVH in the sector:



Working conditions risks: Working conditions can increase risks of GBVH, for instance, the dominant contractual status (i.e. short versus long-term), wage structures (i.e. piece-rate or hourly wage), working hours, freedom of association and right to collective bargaining, and social dialogue.



Geographical and location risks: Risks of GBVH are higher in remote factories with on-site accommodation where workers have limited options to leave. There are also higher risks in areas where there are fewer competitors (i.e. workers are unlikely to leave the factory even if they experience poor working conditions including GBVH). In countries where gender inequality is pervasive, absence of legislation of GBVH, and/or poor implementation of legislation, there is a greater risk of GBVH in the workplace.

1.2. Operational risks

Risk identification should be considered from the view of the SOP. Risk identification at the operational level is about the **presence or absence** of leadership, policy, systems, norms and culture, and training, which support prevention of or response to GBVH.

A good risk assessment process will consider risks across all relevant SOPs. Risk assessments must be conducted as part of managing occupational health and safety. Hazards and risks of GBVH must be identified with the participation of workers and their repre-

sentatives. Lack of information on potential risks should be considered a high risk in itself.

For example, SOP1 refers to Human Resource Management and is **should guide all companies** in the apparel supply chain. Identification of gaps in the company's prevention and risk of GBVH using this SOP will enable identification of potential risks with leadership, policy, systems, norms and culture and training. Some indicators that could be used to identify risk are outlined below:

Leadership	Policy	Systems	Norms and Culture	Training
<input type="checkbox"/> Leaders display sexist behaviour	<input type="checkbox"/> No policy on gender equality and non-discrimination	<input type="checkbox"/> No grievance mechanisms	<input type="checkbox"/> GBVH seen as "normal"	<input type="checkbox"/> No training provided to employees
<input type="checkbox"/> Leaders do not publicly promote gender equality and inclusion	<input type="checkbox"/> No policy on GBVH	Single grievance mechanism (i.e. no informal grievance mechanisms for GBVH cases)	<input type="checkbox"/> GBVH cases are ignored and/or not treated seriously	<input type="checkbox"/> No training provided to employees receiving complaints
<input type="checkbox"/> Policies, processes, and initiatives on gender equality and inclusion are not resourced by management	<input type="checkbox"/> Gender equality, inclusion, and GBVH prevention and response are not integrated across workplace policies	<input type="checkbox"/> Victim and survivor-centred standards not applied	<input type="checkbox"/> Perpetrators are not punished	<input type="checkbox"/> Trainers are not gender sensitive
<input type="checkbox"/> Leaders do not track progress on gender equality and inclusion	<input type="checkbox"/> Rights, roles, and responsibilities are not clearly defined	<input type="checkbox"/> Grievance mechanisms on GBVH are not gender sensitive and inclusive	<input type="checkbox"/> Punishes bystander action	<input type="checkbox"/> Trainers are not experienced in responding to GBVH incidents
<input type="checkbox"/> Leaders do not ask for regular reporting on GBVH	<input type="checkbox"/> Poorly understood policy by workers and managers	<input type="checkbox"/> Mandatory arbitration is required	<input type="checkbox"/> Employees are discouraged from reporting	
<input type="checkbox"/> No leadership accountability on the prevention and response to GBVH	<input type="checkbox"/> No leadership accountability on the prevention and response to GBVH	<input type="checkbox"/> No referral system in place	<input type="checkbox"/> Management discourages data collection and reporting on the number of cases	
<input type="checkbox"/> Absence of women in leadership positions	<input type="checkbox"/> Absence of women in leadership positions	<input type="checkbox"/> Confidentiality is not guaranteed		
		<input type="checkbox"/> Staff are not trained on gender equality, inclusion, and investigation skills		
		<input type="checkbox"/> Little to no trust on grievance mechanisms		

Once the GBVH and operational risks are identified, company teams should consider the likelihood of each risk, its potential impact including its severity and the number of persons affected (as well as disproportionately affected), and the company's ability to remediate potential cases of GBVH.

2. Develop a risk management plan

After identifying the risks, companies should develop a risk management plan by going through each risk and assessing whether there are enough measures in place to mitigate the risks currently, and if further action is warranted. As part of this process, remedial measures should be considered in case risks are not fully mitigated. In addition, companies should consider residual risks even if the measures are in place.

3. Monitor risk

Monitoring risk requires having information available on how risks are tracking (current status), whether there are any changes, and be available with regularity that suits your management approach, this might be monthly, quarterly or annually, depending on the risk. Monitoring systems should be early warning of risk coming so impact can be limited.

4. Review risks

The last step is the regularly review the risk management plan against the data collected in the monitoring systems. Broadly, the risk management framework and approach should involve a board, taskforce, or owners with the ability to govern the risk system. The responsible persons or bodies should regularly review risks and mitigation actions (the risk management plan). This may lead to improvements or adjustments to further help minimise risk and respond to any emerging needs.

Resources

Business Fights Poverty. 2019. How Business Can Tackle Gender Based Violence in the World of Work.

Available at:

<https://businessfightspoverty.org/articles/how-can-business-tackle-gender-based-violence-in-the-world-of-work/>.

ICRW. 2020. Self-Diagnostic Tool and Scorecard.

Available at:

<https://www.icrw.org/gender-equity-in-textile-clothing-and-footwear-manufacturing-resource-hub/self-diagnostic-tool-and-scorecard/>.

ILO. 2014. A 5 Step Guide for employers, workers, and their representatives on conducting workplace risk assessments.

Available at:

https://www.ilo.org/wcmsp5/groups/public/---ed_protect/---pro-trav/---safework/documents/publication/wcms_232886.pdf.