Supporting Companies to Develop and Manage Community-Based Grievance and Feedback Mechanisms Regarding Sexual Exploitation, Abuse and Harassment

TOOLKIT

January 2022

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Introduction

The responsibility of companies to assess, understand, and address the social risks and impacts of doing business has become a core focus of their social and environmental business strategies. Central to the success of these strategies is the meaningful engagement of communities who are affected by the company's operations, including providing opportunities for them to raise grievances. This is widely accepted across the private sector and features throughout various international frameworks such as the United Nations Guiding Principles on Business and Human Rights. It is also a key objective of the IFC's Performance Standards on Environmental and Social Sustainability.

Despite this, there continues to be a lack of accessible, safe avenues for affected communities to lodge grievances and provide feedback to companies. When such mechanisms do exist, they are not often designed to receive reports on highly sensitive issues such as **sexual exploitation, abuse and harassment (SEAH)** that is perpetrated by company workers.

It is well evidenced that instances of SEAH can be committed against community members as result of a company's operations or services[i]. However, underlying drivers such as power imbalances between the company and affected communities, patriarchal cultures, harmful gender norms, and fear of stigmatization and reprisals result in chronic underreporting of SEAH. Companies have a duty of care to ensure that effective mechanisms are in place and that they are equipped to handle sensitive reports. This includes being able to rapidly respond to reports of SEAH and ensuring survivors are connected with appropriate support services.

This toolkit is intended to support private sector companies to amend existing community-based grievance and feedback mechanisms, or develop new mechanisms, that are designed to receive and effectively manage reports of sexual exploitation, abuse and harassment in addition to other types of grievances and feedback. A 5-step process is presented to guide companies through each stage, from engaging communities through to monitoring the efficacy of such mechanisms. A range of templates are provided throughout the toolkit to support the successful completion of each step in the process.

EXAMPLES OF SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (SEAH)

- Sexual assault perpetrated by a company worker

- A company's security guards only allow women to pass through an area in exchange for sexual favours

- Company contractors sexually harass street vendors travelling to work on the company bus

Gender and Safeguarding expertise

Developing grievance and feedback mechanisms to include the handling of SEAH reports requires gender and/or safeguarding expertise to lead, or heavily advise, throughout the process. If the company does not have this level of expertise in-house, it is strongly recommended to identify external expertise to guide the company through this process.

Glossary[ii]

Child	Any person under the age of 18 years.
Company	Private sector organizations, including recipients of an investment from an investor.
Complainant	The person making the complaint, including the alleged survivor of the sexual exploitation and abuse or another person who becomes aware of the wrongdoing.[iii]
Duty of care	A legal or moral obligation requiring an adherence to a standard of reasonable care to prevent foreseeable harm.
Grievance mechanisms	Processes that can be used by workers, community members and service users to make complaints or report concerns.
ILO Convention No. 190 and Recommendation No. 206	International Labour Organization Convention No. 190 and Recommendation No. 206 of 2019 are the only binding international instruments on violence and harassment in the world of work, setting out a clear framework and global mandate for preventing and addressing it. The Convention protects workers and other persons in the world of work, including employees as defined by national law and practice, as well as persons working, irrespective of their contractual status, persons in training, including interns and apprentices, workers whose employment has been terminated, volunteers, jobseekers and job applicants, and individuals exercising the authority, duties, or responsibilities of an employer. It applies to all sectors, whether private or public, both in the formal and informal economy and whether in urban or rural areas.
Perpetrator	A person (or group of persons) who commits an act of SEAH or other type of crime or offence.[iv]
Safeguarding	The organizational system to prevent harm or unethical behaviour being perpetrated by individuals.
Sexual exploitation	Any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another.
Sexual abuse	The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with children (as defined by the UN Convention on the Rights of the Child as any person under the age of 18) is sexual abuse, regardless of the age of maturity or consent locally. Mistaken understanding of the age of a child is not a defence.
Sexual harassment	Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment occurs between personnel/staff.[v]

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Glossary cont.

Subject of the complaint	A person or entity who/that is the focus of an investigation.[vi]
Survivor	A person who has experienced sexual exploitation, abuse, and harassment and survived. The terms "victim" and "survivor" are often used interchangeably. "Survivor" is the term generally preferred in the psychological and social support sectors.[vii]
Victim	A person who has experienced sexual exploitation, abuse, and harassment. "Victim" is a term more often used in the legal and medical sectors.[viii]
Violence and harassment	A range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.

Legend

Tip	Watch out	Further reading and guidance

Key Principles

Developing a community-based grievance and feedback mechanism to include handling reports of sexual exploitation, abuse and harassment must be underpinned by a number of key principles in order to ensure safety and protection to all those affected and prevent more harm from occurring.

- **Safe.** Potential dangers and risks to all parties must be considered in the design and management procedures and incorporate strategies to prevent further harm. Mechanisms must also ensure the safety of anyone accessing it, including protection from potential reprisals. Safety is also paramount when considering the types of support services for survivors, ensuring they are safe for the survivor to access.

- **Confidential.** Reports of sexual exploitation, abuse and harassment require a high degree of confidentiality, such as restricting access to, and sharing of information about, the report and throughout the case handling process. This is to ensure the protection of the complainant, survivor, and any other individual involved in the report. Maintaining confidentiality can promote trust with the survivor and lead to more positive relationships between the affected community and company.

- **Survivor-centred.** The rights, needs, and wishes of the survivor should be prioritized throughout the case handling process. This means creating a supportive environment that empowers the survivor rather than being made to feel powerless, treating them with dignity and respect, and supporting them to make their own decisions throughout the process.

- **Culturally appropriate.** Mechanisms that handle sensitive reports like sexual exploitation, abuse and harassment must be grounded in a strong understanding of existing social customs and cultural practices in the community. It is critical to consider the existing power dynamics, cultural taboos, and customs within communities and how they affect different groups as these factors will influence the design, community buy-in, and overall use of the mechanism.

- **Inclusive.** A wide range of groups from the community should play a key role in informing how the mechanism is designed, managed, and monitored. This includes participation from different groups according to age, class, gender, race/ethnicity, physical and mental capabilities, language, etc. that exist in the community. These groups will have different perspectives and views on what constitutes a safe, accessible, and trustworthy grievance and feedback mechanism.

5 Step Process

1 CONSULT & ASSESS

Meaningfully engage community members early in the design process to promote buy-in, ownership and trust in the mechanism. Conducting a community assessment will identify types of violence and their root causes and power differentials within the community, amongst other issues.

2 DESIGN

Design with the community, not for them, to ensure the mechanism is deemed to be culturally acceptable and appropriate. Ensure channels for handling SEAH are confidential, safe, and accessible to different groups and prevent stigmatization and reprisals.

3 PUBLICIZE

In order for the mechanism to be used, communities must first understand what SEAH is. Raise awareness on SEAH and the company's commitment to preventing and responding to SEAH. Include key information in communications material and use a range of methods, such as visual, audio, and written material.

4 RECEIVE, RECORD & RESPOND

Clear protocols must be established to ensure efficient, timely, and effective handling of SEAH reports. Ensure such protocols consider the specific requirements for responding to SEAH reports, as opposed to other, non-sensitive grievances and feedback.

5 MONITOR, EVALUATE & REPORT

Solicit feedback from communities on what is and isn't working. Make necessary adjustments to improve the safety and efficacy of the mechanism. Share information with communities on how reports have been dealt with to build trust and demonstrate accountability.

1 CONSULT & ASSESS

WHY CONSULT COMMUNITY MEMBERS?

Community members are best placed to inform the company on how to best structure the feedback and grievance mechanism so that it is culturally appropriate and trusted by the community. The process of engaging with communities can be an empowering one that builds trust if done appropriately. From the outset, ensure that information is shared about the project and what is hoped to achieve. Engage them as meaningful actors in the process as opposed to a group to simply check progress against. Once the community feels ownership of the project, they will be more willing to openly share their views and preferences for how to ensure the successful set-up and management of the grievance and feedback mechanism.

Challenges initiating community dialogue

Cultural traditions, a lack of trust, and uncertainty of the process may result in company's struggling to gain access to communities. Consider partnering with a local organization a local organization specializing in gender-based violence and/or protection issues. Local organizations are likely to already have strong relations with communities and can gain access in ways that may simply be unavailable to the company. NB: Partnering with local organizations does not transfer the company's duty of care.

WHO TO ENGAGE?

Engage a wide range of community members to ensure the perspectives and experiences of different groups are collected[1]. However, it is particularly important to engage girls and women because they are more likely to experience SEAH and their views must fundamentally shape how the mechanism is designed. Hold separate sessions with specific groups who may not feel comfortable speaking openly in mixed groups. This is particularly relevant to girls, women and groups who already experience marginalization and/or discrimination[2]. Groups who are considered at risk will vary by community so get support from community members to identify such groups.

Understanding SEAH[ix]

Ensure all those engaged in this process understand the drivers and root causes of SEAH. SEAH is driven by an abuse of power and inequalities. Individuals with more power have greater opportunities to exploit that power over those who have less power. Factors that dictate how much power someone has include their gender, race, disability status, gender identity, sexual orientation, class, and access to resources. Girls and women are more likely to be targeted for SEAH because of gender inequality which privileges men over women. Men are more likely to be perpetrators for similar reasons.

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[1] For example, girls, women, boys, men, non-binary individuals, people with diverse sexual orientation, gender identity, and sex characteristics, people from different racial/ethnic backgrounds and socio-economic statuses, those with varying literacy rates, and people with different mental and physical capabilities.

[2] Ensure only females are present in these group discussions, this includes facilitators, translators, and note takers.

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HOW TO CONSULT COMMUNITIES?

It is important to recognize the community structures in place and develop your engagement plan with those structures in mind. For example, consider speaking with community leaders first to make them aware of your intentions, secure buy-in, and gain support in mobilizing the community to engage with the company.

Conducting Focus Group Discussions is an effective way to gather information about the risks faced by different groups, attitudes around reporting sexual abuse, how people feel most comfortable reporting, and what they consider to be a safe, accessible, and effective grievance and feedback mechanism. Girls and women are particularly important to ensure they see the mechanism as a safe and trusted way to report SEAH.

Understanding power between the company and affected communities

Unequal power dynamics are inherent between companies and affected communities, particularly in communities with high rates of poverty. Companies bring employment opportunities, investment in the local community, and workers have access to resources that community members do not. This unequal power differential can lead to an abuse of power – on an individual level between a company worker and community member but also more broadly in how the company asserts its position within the community. It is critical for the company to be aware of these power differentials when engaging with communities. Appointing a Community Liaison Officer who is from the community, or works closely with the community, will help to identify strategies to overcome these power differentials when designing and delivering activities with the community.

UNDERSTANDING THE CONTEXT

A community assessment[3] will support the company to identify the root causes of sexual violence, abuse and exploitation that is perpetrated within the community and how reports are addressed by formal reporting structures and informal community mechanisms. It will examine power relations between different groups and how that increases risk factors for certain groups. Lastly, an assessment will identify existing protective mechanisms that exist which the company's grievance and feedback mechanism could draw upon. This assessment should be led by a local expert or organization with expertise in safeguarding and/or gender-based violence. An example Terms of Reference for what the assessment would entail is provided as guidance.

More information on consulting and assessing to inform the mechanism

Do No Harm Policy by the Girls Education Challenge.

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[3] Ensure the Do No Harm principle is applied when conducting the assessment. Do No Harm avoids exposing people to additional risk through your work. Prior to conducting an assessment identify the potential negative effects of the activity and put mitigation measures in place to minimise harm from occurring. It is particularly critical to avoid asking direct questions about violence or people's experiences with violence or abuse as that could lead to direct disclosure, re-traumatization, or risk of stigmatisation.
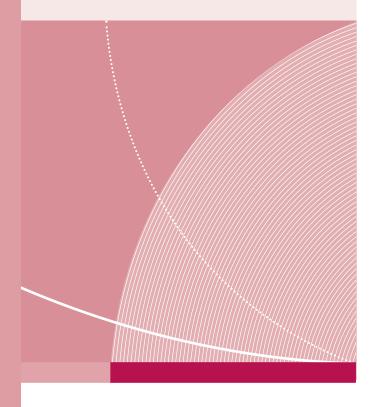
② DESIGN

There is no 'one size fits all' approach to designing a community-based grievance and feedback mechanism which focuses on SEAH. Involve different community groups, particularly girls, women, and at-risk groups throughout the design process to ensure the cultural context, local customs, reporting preferences, and specific barriers groups face to reporting SEAH are considered.

SELECTING A MODEL FOR MANAGING SEAH REPORTS

There are several options for structuring a mechanism to handle SEAH reports. The model adopted should be based on a range of factors, such as capacity and expertise of in-house staff, availability of local expertise and services, and the views of those most at risk of experiencing SEAH, such as girls, women, and other at-risk groups. All options must be accompanied by a step-by-step process for how to manage the grievance mechanism.

Option 1: **Adapt community grievance and feedback mechanism to include SEAH reports.** All SEAH reports would be directed through the existing company grievance procedures. Adaptations to procedures would require a shorter timeframe for responding to reports, conducting an urgent assessment to identify safety and protection risks, and connect the survivor to support services if they choose or where in a child's best interest.

Option 2: **Link community grievance and feedback mechanisms to an intermediary GBV service provider.** Complainants could access the company reporting mechanism or report directly to the GBV service provider. The service provider would process and monitor SEAH cases, including provision of support services if requested. Duty of care rests with the company: The company retains responsibility to verify the allegation, conduct an investigation, and recommend actions.

Option 3: **Outsource SEAH reports to a third party to manage.** An expert organization would process and monitor SEAH cases in addition to verifying the allegation, conducting the investigation, and recommending actions to company staff who oversee the grievance mechanism.

No matter what the configuration for managing grievance and feedback mechanisms, the company must retain overall responsibility and accountability for the mechanism.

DESIGNING A CHILD-FRIENDLY REPORTING MECHANISM

The mechanism must be accessible to children with at least one reporting mechanism available in spaces children occupy to facilitate easy access. Children may require specific entry points that account for their needs, wishes and developmental age. The way that children complain will likely be more informal than the way adults lodge complaints and reporting mechanisms must be designed to identify these signs and have the tools in place to adequately address them. For example, have a Community Representative visit spaces where children are – like schools and youth centres – where they can speak directly to the Representative, as opposed to being asked to formally complete a form and submit it.

Internal vs third-party management

Local organizations with expertise in GBV and support services may be well placed to play a key role in the processing and management of SEA reports. Their existing relationship with communities is likely to secure greater community trust and buy-in and help mitigate perceptions of bias or a lack of impartiality towards the company.

The mechanism must be adequately resourced with technical expertise to effectively handle SEA reports. If this expertise is lacking, or there are insufficient resources available, it is recommended to contract some or all the management to a third-party.

GBV service providers are not necessarily in the position, have expertise, resources nor mandate in conducting investigations. Depending on scale of company operations and impact upon affected community, it may be necessary for the company to build a roster of expert investigators to draw upon even if some or all the management is outsourced to GBV service provider.

Companies should provide financial and in-kind support to local organizations to ensure they are effectively resourced and able to deliver their commitment. This also demonstrates the company's investment to strengthen local capacity within affected communities.

CHANNELS FOR REPORTING

In designing the mechanism, it is important to offer multiple channels that communities have choices for reporting SEAH. At least one channel must ensure anonymous[4] reports can be made. Refer back to community consultations to ensure the needs and views of those who are most at-risk of SEAH which inform the design of reporting channels. It is critical to understand how gender norms and who has access to, and control over, resources can shape these groups' ability to report SEAH. For example, a hotline may be inaccessible if girls and women cannot use the phone without male supervision. Types of reporting channels include reporting to an individual, complaints boxes, feedback desks, hotlines, phone, SMS, email, meetings, and community groups. They must overcome cultural barriers that may exist, ensure confidentiality, and overcome language or disability barriers.
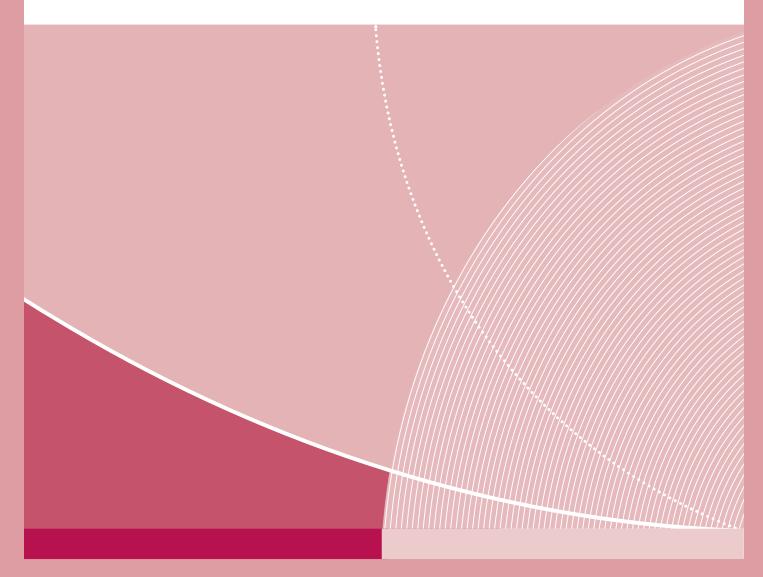
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[4] An anonymous report is where the identity of the victim/complainant is unknown. Anonymous reports may limit the ability to conduct a thorough investigation if insufficient detail is provided, however, it is important to treat such reports as seriously as those where the victim/complainant is known. The grievance and feedback mechanism should have at least one way for affected communities to make anonymous reports.

BOTTOM LINE

SEAH can be a highly taboo and stigmatizing issue to address. Grievance and feedback mechanism must prevent victimization, re-traumatization and stigmatization of survivors and prioritize their needs, rights, and wishes.

More information on designing community-based grievance and feedback mechanisms

Child-friendly Complaint Mechanisms by UNICEF
The Safeguarding Standards by Keeping Children Safe
Disability-inclusive Child Safeguarding Guidelines by Able Child Africa

③ PUBLICIZE

Once the mechanism is set-up, a communications strategy should be developed and implemented to raise awareness amongst community members. Reports of SEAH can only be made if sufficient levels of awareness exist amongst affected communities on what constitutes SEAH. It is also necessary to promote information about the company's Code of Conduct in order for community members to know what conduct to expect from workers, suppliers, and contractors.

WHAT INFORMATION SHOULD BE PROMOTED ABOUT THE MECHANISM?

- The definition of sexual exploitation, abuse and harassment and the company's Code of Conduct
- That affected communities have a right to be free from sexual exploitation, abuse and harassment
- The types of issues, concerns, and complaints that can be reported via the mechanism
- Where, when, and how community members can access the mechanism – include specific details like names of individuals, contact details, locations of where to report
- Who is responsible for receiving the report what training they have received
- The process for how the report will be handled, including the steps taken to ensure safety and confidentiality of information including identities
- The timeframe for handling reports
- What the complainant can expect after making a report
- The rights of, and protection provided to, complainants and victims/survivors (for example, privacy, confidentiality, protection from reprisals, etc.)

Choosing the right language and visual imagery when talking about the grievance and feedback mechanism

Careful consideration must be given to the words and visual imagery used to describe the mechanism and how it is promoted. Avoid using technical language that community members may not understand. Community members are not likely to use the mechanism if they believe there is a risk of stigmatization or reprisals from accessing it, or if there is a perceived negative association with the mechanism.

Avoid using images depicting any form of violence or showing people as disempowered victims. These scenarios may trigger a survivor and lead to re-traumatization.

Consult communities on the most appropriate language to use to describe the mechanism.

SPREADING AWARENESS AMONGST COMMUNITIES

There are a number of factors to consider when designing communications activities targeting community members:

- **Use simple language that is easy to understand.**
  Community members are not likely to understand communications material that is full of jargon and technical language. Keep the messaging simple and use locally appropriate phrases and words that will resonate with communities. Also ensure your message is child-friendly, for example the use of imagery or cartoons that will resonate with younger audiences.

- **Provide materials in accessible formats and languages.**
  It is critical to design a range of materials that cater to different people's needs. Using imagery and developing visually engaging material will be accessible to those with low literacy rates. Ensure material is translated into all local languages. Consider how to communicate with individuals who have a disability, for example using pictures or images for those who have an intellectual disability, or displaying information at appropriate heights for those who use wheelchairs.

- **Develop and deliver a range of communications activities.**
  A range of activities are required on a regular basis to ensure communities are exposed to consistent messaging about the mechanism and other relevant details, like the company's Code of Conduct, what SEAH is, and how to report it. Communications activities must reach the most at-risk populations and be tailored based on their needs and preferences. This can be achieved by identifying how these groups currently access information and how they would like to be informed about the reporting mechanism.

RAISING AWARENESS AMONGST WORKERS, SUPPLIERS AND CONTRACTORS

Company workers and associated personnel also need to be made aware of the community grievance and feedback mechanism. Hold sessions with workers and produce internal communications that explain the purpose of the mechanism, why it exists, what types of grievances and feedback communities are encouraged to report, emphasizing SEAH, and relevance to the company's policies and procedures. It is also an opportunity to re-circulate the company's Code of Conduct and explain the connection between the Code of Conduct and the community grievance and feedback mechanism that is designed to receive reports of SEAH perpetrated by workers, suppliers, and contractors. Finally, emphasize that the company will not tolerate reprisals within the company or community for any grievance or complaint reported from the community.

> ### Further reading for guidance on publicizing the grievance and feedback mechanism to communities
> Publicizing a Grievance Mechanism and Providing Access
> by the Compliance Advisor Ombudsman
> Contextual Communications for Safeguarding by the Resource and Support Hub

④ RECEIVE, RECORD & RESPOND

A sign of an effective grievance and feedback mechanism is to see an increased number of complaints once it is set-up. This is a sign that the mechanism is working. It is anticipated that the number of reports would decrease over time as a result of effective awareness-raising efforts, training, and the company's ability to effectively prevent, manage risks and respond to SEAH reports.

Receiving and managing SEAH reports differ in nature to the way in which non-sensitive types of feedback and grievances are managed and they require detailed procedures to be put in place. Reports concerning sexual exploitation, abuse and harassment require a grievance management process that is grounded in a survivor-centred approach. Factors that must be built into the process for handling SEAH reports include the speed of response to the initial report, the level of confidentiality applied throughout the process to build trust with the survivor and prevent stigmatization, and ensuring all stages are grounded in a survivor-centred approach.

What does it mean to take a survivor-centred approach?

A survivor-centred approach creates a safe and supportive process that respects the survivors' rights and prioritizes their needs and wishes. The survivor has a right to: (i) be treated with dignity and respect instead of being exposed to victim-blaming attitudes, (ii) choose the course of action in dealing with the violence instead of feeling powerless, (iii) privacy and confidentiality instead of exposure, (iv) non-discrimination based on gender, age, race/ethnicity, ability, sexual orientation, HIV status, or any other characteristic, and (v) receive comprehensive information to help them make their own decision instead of being told what to do. *Adapted from UN Women[x]*.

RECEIVE AND REGISTER REPORTS

The company should have a designated focal point to receive complaints and log them into a central register. The initial processing of complaints should identify SEAH reports and immediately direct them to a designated focal point who is trained in assessing reports. The reports should be immediately assessed to identify safety and protection risks the victim/survivor may be exposed to and connect the survivor to support services if they choose to or, if the child is the survivor, it is in their best interest.

SURVIVOR SUPPORT SERVICES

In order to connect survivors to support services based on their wishes or best interest of the child, the company will need to know which appropriate services are available 'or not' in the community. First, enquire with local community organizations as to whether or not a mapping exits that identifies the existence and strength of different health, psychosocial, and legal services survivors may wish to be connected to. If a mapping does not exist, resources are allocated to have one conducted. It is important to remember that not all survivors will be girls and women so it is important to ensure that referral pathways exist for a range of services that can support all at-risk groups.

Immediate medical support

If there is any indication to suggest that unwanted sexual activity has occurred within the past 72 hours, immediate referral for medical treatment for emergency contraception or treatment to prevent HIV must be offered to the survivor.

REPORTS THAT REQUIRE INVESTIGATION

Not all reports will automatically be investigated. If an investigation is required, the investigations procedures should ensure a mixed gender balance of investigators to be able to cater to the requests of the survivor and others who are interviewed.

DECIDE IF THE MECHANISM CAN RECEIVE REPORTS INVOLVING COMPANY WORKERS ONLY OR FOR SUPPLIERS AND CONTRACTORS TOO

Companies must anticipate reports that involve their workers as well as their suppliers and contractors. It is important to remember that community members will not likely know the difference between the company and those delivering work or services on behalf of the company. Given the scale of many companies' operations and the volume of suppliers and contractors dealt with, it is advisable to develop the company's community-based grievance and feedback mechanism to receive concerns that involve workers as well as suppliers and contractors. This is particularly important given the level of expertise and protocols that must be put in place to ensure effective response to, and management of, sensitive reports such as SEAH. One mechanism that receives complaints from anyone associated with the company will not only avoid confusion amongst community members, but it will also ensure multiple policies and mechanisms do not conflict with one another.

Further reading for guidance on receiving, recording and responding to SEAH reports

Building Safer Organisations Guidelines: Receiving and Investigating Allegations of Abuse and Exploitation by Humanitarian Workers by the International Council of Voluntary Agencies

Model Complaints and Investigation Procedures and Guidance Related to Sexual Abuse and Sexual Exploitation by the IASC Task Force on Protection from Sexual Exploitation and Abuse

Management of Child Safeguarding Allegations by Keeping Children Safe

Example Service Mapping Template by the Interagency Gender-based Violence Case Management Guidelines

Safeguarding Service Mapping Tool by the Girls Education Challenge

Determining the Best Interests of the Child by UNHCR

5 MONITOR, EVALUATE & REPORT

Consistent monitoring is the only way to find out if the mechanism is effective and delivering the right support for survivors. The approach to monitoring the mechanism for SEAH reports should be a continuous dialogue with key stakeholders to identify gaps, apply lessons, and demonstrate transparency and accountability. The company has a responsibility to provide feedback to the community as to how the mechanism has been able to respond to SEAH reports and support survivors.

WHAT TO MONITOR AND EVALUATE

Having a set of clear indicators in place will help the company to monitor and evaluate the success of such mechanism. Some data points can be collected to demonstrate the efficacy of the procedures in place. However, given the nature of the mechanism, feedback from community groups[5] who are most at-risk of SEAH should be considered the most important data source. Their perceptions on how well the mechanism is working, how much they trust reporting SEAH, and the extent to which they were able to access support services are all critical data points that indicate the effectiveness of the mechanism.

SOLICITING FEEDBACK ON THE GRIEVANCE AND FEEDBACK MECHANISM

A range of topics should be discussed with communities and any third-party involved in the management of the mechanism, if relevant, on a regular basis to understand if the grievance and feedback mechanism is fit for purpose. Community members should be given an opportunity to provide anonymous feedback if they do not wish to be identified. Satisfaction surveys or small group discussions led by a community representative who shares information with the company are some suggestions for encouraging anonymous data collection.

ENSURING ACCOUNTABILITY

Accountability should be considered in two ways. Firstly, is the accountability companies have to affected communities. Secondly, is the accountability that exists within the company. Senior management should be actively involved in reviewing the company's performance against the agreed indicators to ensure accountability. It is also important for the company's Community Liaison Team/Officer to share the company's performance metrics with affected communities to promote open dialogue and transparency.

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[5] It is critical to remember the Do No Harm principle and never ask direct questions about an individual's experience with violence or abuse that could lead to direct disclosure, re-traumatisation, or risk of stigmatisation.

REPORTING BACK TO COMMUNITIES

An important part of ensuring transparency and accountability with communities is to feedback to communities about the action that has been taken from reports made via the grievance and feedback mechanism. It is important not to disclose any confidential or case specific information, however, consider sharing with communities:

- A high-level overview of the actions taken as a result of the reports
- Adjustments made in how cases are handled based on learning from reports that have come through.

⚠ Be careful about what information is shared

Be mindful of what level of detail is reported back to communities. If there are minimal reports made, even sharing high level information could pose a risk to identifying the survivor, especially if information has been spread throughout the community or has become known to the community. Prior to holding feedback meetings, discuss the content of what will be discussed with a Community Representative or Community Liaison Officer to ensure no information shared will put anyone at risk of further harm, stigmatization, or reprisal.

TAKING ACTION

Once information is collected from communities, the company must have processes set-up to ensure the information is applied to making the necessary improvements to the mechanism. It is also important that these adjustments include further consultations with at-risk groups if more information is required. Ensure that any adjustments made to the grievance and feedback mechanism are included in communications activities, so the community is aware of what has changed. The mechanism should be subject to periodic reviews to ensure it remains effective and fit for purpose.

ⓘ Further reading for guidance on monitoring, evaluating and reporting

Sexual Exploitation and Abuse Prevention & Response Tally Sheet
by the Humanitarian Accountability Partnership (HAP)
Sample feedback forms and monitoring surveys in Prevention against Sexual Exploitation and Abuse (PSEA): Inter-agency cooperation in community-based complaints mechanisms Global Standard Operating Procedures
by the Inter-Agency Standing Committee
Safeguarding and Evaluation – A Brief Guidance Note by the Girls Education Challenge
Safeguarding: Monitoring Policy and Compliance by the Girls Education Challenge
Safeguarding: Culture, Enabling Environment and Implementation
by the Girls Education Challenge
Safeguarding: Planning a Safeguarding Monitoring Trip
by the Girls Education Challenge
Safeguarding: Safety Audit by the Girls Education Challenge
Safeguarding: Non-specialist Monitoring by the Girls Education Challenge
Safeguarding: Distance Monitoring Tool by the Girls Education Challenge

Endnotes

i   World Bank (2020) *Insights of the World Bank Inspection Panel: Responding to Project Gender-Based Violence Complaints Through an Independent Accountability Mechanism, Emerging Lessons Series No. 6.* https://inspectionpanel.org/sites/inspectionpanel.org/files/publications/Emerging%20Lessons%20Series%20No.%206-GBV.pdf

ii   Unless otherwise referenced, the terms and definitions used in this glossary are taken from CDC, ERBD and IFC (2020) Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector. www.ifc.org/addressinggbvh

iii   Inter-Agency, CHS Alliance.

iv   United Nations.

v   Additional reference to sexual harassment occurring in the work environment between personnel/staff.

vi   United Nations.

vii   The term 'GBVH' was replaced with 'sexual exploitation, abuse, and harassment'.

viii   The term 'GBVH' was replaced with 'sexual exploitation, abuse, and harassment'.

ix   Sexual exploitation, abuse and harassment is often conflated with gender-based violence. It is important to distinguish between the two when designing a community grievance and feedback mechanism to receive and respond to SEA reports. For more information on SEA and GBV see Resource and Support Hub (2021) Understanding SEAH and GBV. https://safeguardingsupporthub.org/documents/bitesize-understanding-seah-and-gbv

x   Survivor-centred approach. UN Women. https://www.endvawnow.org/en/articles/652-survivor-centred-approach.html