



European Bank  
for Reconstruction and Development



European  
Investment Bank

# Managing gender-related risks in EBRD and EIB investments

A good practice note

June 2026

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# Executive summary

The European Bank for Reconstruction and Development (EBRD) and the European Investment Bank (EIB) are committed to advancing gender equality in their investments in order to facilitate responsible, inclusive and sustainable investment outcomes.

To this end, the EBRD and the EIB require gender-related risks and impacts to be identified and addressed in environmental and social due diligence (ESDD) and monitoring. Taking a gender-responsive approach to project due diligence helps mitigate potentially adverse effects on women and marginalised gender groups, while making the most of opportunities to promote gender equality and enhance business productivity and competitiveness.

This note highlights some of the most significant risks and impacts for women and girls, and provides practical tools to help clients and consultants involved in EBRD and EIB investments design and implement those projects with gender in mind. In line with EBRD and EIB requirements, clients' approach to identifying and addressing gender risks and impacts should be appropriate to the nature and scale of the project and commensurate with the level of its environmental and social (E&S) risks and impacts. This note is not intended to create or impose any new requirements or standards on clients or consultants, and should not be treated as a compliance document.

Organised into nine sections, the guidance outlines the process for understanding, assessing, preventing, responding to and monitoring gender-related risks and impacts. It includes examples of good practice, signposts to additional resources and a series of practical tools.

## **Section 1: Introduction**

This section outlines the purpose and scope of the note and offers guidance on how to use it.

## **Section 2: How are gender risks and impacts relevant to EBRD and EIB investments?**

Gender inequality can lead to differentiated risks and impacts for women and gender minorities in investment projects. The EBRD and the EIB expect clients to address these risks and impacts appropriately. Applying a gender lens to project due diligence has wider benefits, such as improved risk management, stakeholder trust and operational outcomes.

## **Section 3: Incorporating gender into project E&S due diligence**

Clients are encouraged to embed gender considerations throughout the ESDD process. Key steps include project screening, assessment, management planning, stakeholder engagement and monitoring. Gender is a cross-cutting issue that must be incorporated into all aspects of project planning and implementation.

## **Section 4: Identifying and assessing gender-related risks**

Clients can identify and evaluate gender-related risks and impacts through screening, scoping and baseline development. This process should consider how gender intersects with other personal characteristics to compound risk. An additional gender assessment may be needed, particularly in contexts where there are significant project or contextual risks.

## **Section 5: Mitigating gender risks and impacts through management systems**

Clients are encouraged to embed gender considerations into overarching management systems across key operational areas, including the workplace, communities, procurement of goods and services, land and resettlement, and environment and climate.

## **Section 6: Incorporating gender considerations into stakeholder engagement processes**

Stakeholder engagement should be inclusive and culturally appropriate to capture the perspectives of women and gender minorities. Clients should plan and design gender-sensitive consultation strategies to support the inclusion of women's voices and feedback for reflection in project planning and decision-making.

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### **Section 7: Making gender risk management part of ongoing operations**

Measures identified during due diligence to respond to gender risks and impacts can be embedded in project design and monitored over time. This should be underpinned by adequate budget and resource allocation, as well as training, awareness raising and communication. Specific procedures should be in place to deal with grievances requiring special protection measures, such as reports of discrimination or gender-based violence and harassment (GBVH), including protection from reprisals.

### **Section 8: Responding to adverse gender impacts**

Responses to gender-related grievances and incidents, including GBVH, should prioritise survivor-centred approaches, protection from retaliation and access to appropriate support services. Accountability and continuous improvement are also essential for effective grievance mechanisms.

### **Section 9: Monitoring and reporting**

Gender risks and impacts should be monitored continually and mitigation measures and outcomes regularly reported. Gender-disaggregated data and key performance indicators (KPIs) help track progress and ensure compliance with EBRD and EIB requirements, while also supporting adaptive management and transparency.

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## Abbreviations and acronyms

CAPSEAH	Common Approach to Protection from Sexual Exploitation, Sexual Abuse and Sexual Harassment
E&S	environmental and social
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
ESAP	environmental and social action plan
ESCP	environmental and social commitment plan
ESDD	environmental and social due diligence
ESIA	environmental and social impact assessment
ESMP	environmental and social management plan
ESMS	environmental and social management system
ESP	Environmental and Social Policy (EBRD)
ESR	Environmental and Social Requirement (EBRD)
EU	European Union
FGD	focus-group discussion
GBVH	gender-based violence and harassment
HR	human resources
KPIs	key performance indicators
LGBTQI+	lesbian, gay, bisexual, transgender, queer, intersex and other identities
NGO	non-governmental organisation
OSH	occupational safety and health
SEP	stakeholder engagement plan
SOGI	sexual orientation and gender identity
STIs	sexually transmitted infections

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## Glossary

Gender	The social and cultural behaviours, attributes, norms and opportunities associated with an individual's sex, sexual orientation, or sexual or gender identity, which are socially constructed, learned, context- and time-specific and changeable.
Gender-based violence and harassment (GBVH)	Umbrella term for violence and harassment directed at people because of their sex or gender, or affecting people of a particular sex or gender disproportionately, and includes sexual harassment.
Gender-disaggregated data	Data that are separated by gender to identify differences in experiences and needs, and to analyse the trends and outcomes between different gender groups.
Gender impact assessment	An assessment conducted to understand the specific gender-related risks and impacts of a project, typically required when significant gender risks are identified.
Gender-responsive approach	An approach that takes into account the rights and interests of women and girls, men and boys, and non-binary and gender non-conforming people, including specific attention to the differing burdens, barriers and impacts they might experience.
Intersectionality	A concept that recognises how different personal characteristics – such as gender, race, class, disability and age – intersect and interact to shape an individual's experiences of discrimination or privilege.
Mitigation measures	Actions designed to reduce adverse environmental and social impacts (including those related to gender) that are identified during project due diligence.
Project	A set of planned works or activities to be finished over a period of time and intended to achieve a particular purpose and for which investor financing is sought by an investee.
Project due diligence	A systematic process to identify, assess and manage the potential environmental and social risks and impacts of a proposed project, including alignment with lender requirements and policies.
Stakeholder engagement	The continuous and inclusive process of interaction and communication between a project and individuals or groups who are affected by or have an interest in the project.
Survivor	A person who has experienced GBVH and survived. The terms “victim” and “survivor” are often used interchangeably. “Survivor” is the term generally preferred in the psychological and social support sectors.

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# 1. Introduction

## 1.1. Purpose and scope

The European Bank for Reconstruction and Development (EBRD) and the European Investment Bank (EIB) are committed to advancing gender equality in their investments in order to facilitate responsible, inclusive and sustainable investment outcomes. Both the EBRD and the EIB have updated their environmental and social (E&S) policies – the EBRD’s 2024 Environmental and Social Policy (ESP),<sup>1</sup> which includes a set of Environmental and Social Requirements (ESRs) that projects are required to meet, and the EIB Group’s Environmental and Social Sustainability Framework, which includes the 2022 Environmental and Social Standards Policy and Environmental and Social Standards<sup>2</sup> – to strengthen gender requirements and embed them in project appraisal and project due diligence.

Alongside their E&S policies, both the EBRD and the EIB have developed dedicated strategies to mainstream gender equality across all their operations, namely, the EBRD’s Gender Equality and Human Capital Strategy 2026-30<sup>3</sup> and the 2017 EIB Group Strategy on Gender Equality and Women’s Economic Empowerment.<sup>4</sup> Both institutions are engaged in a range of activities to promote gender equality, including policy dialogue and technical cooperation projects with clients. This good practice note focuses principally on identifying, assessing and managing gender risks and adverse impacts through project environmental and social due diligence (ESDD), in line with EBRD and EIB E&S policies. It does not cover activities to promote gender equality, which are covered by the gender strategies/action plans.

The purpose of this good practice note is to support EBRD and EIB clients, consultants and other stakeholders in:

- identifying gender risks and impacts in project due diligence in relation to EBRD and EIB investments
- developing appropriate mitigation measures that are proportionate to the scale of the project
- incorporating gender considerations into management systems and decision-making
- monitoring and reporting on gender risks and impacts, and on mitigation measures and their effectiveness.

In order for investments to optimise gender equality outcomes, the EBRD and the EIB require that gender-related risks and impacts be identified and addressed in E&S due diligence and monitoring (which we will refer to as project due diligence). Taking a gender-responsive approach to project due diligence helps mitigate potentially adverse effects on women and marginalised gender groups, while making the most of opportunities to promote gender equality and enhance business productivity and competitiveness. This approach to due diligence should therefore inform the development of the client’s own environmental and social management system, and other relevant E&S planning documents. In line with EBRD and EIB requirements, the client’s approach to identifying and addressing gender risks and impacts should be appropriate to the nature and scale of the project and commensurate with the level of its E&S risks and impacts.

**This note is not intended to create or impose any new requirements or standards on clients or consultants and should not be treated as a compliance document. It aims to share guidance, tools and examples of good practice to help clients and consultants meet existing policy requirements of both the EBRD and the EIB (see also Section 2.2.)**

In this note, the term gender is defined as the social and cultural behaviours, attributes, norms and opportunities associated with an individual’s sex, sexual orientation, or sexual or gender identity, which are socially constructed, learned, context- and time-specific and changeable. This note focuses primarily on risks to and impacts on women and girls, while recognising that gender inequality can affect all people and intersects closely with other characteristics. There are other groups, particularly sexual and gender minorities, whose specific vulnerabilities could be taken into account in

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1 See EBRD (2024a).

2 See EIB (2022).

3 See EBRD (2026).

4 See EIB (2017).

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the process of project due diligence, but these other groups are not covered in detail in this note (see Section 4.2.1 for pointers on identifying risks in relation to sexual orientation and gender identity). Gender-based violence and harassment (GBVH) risks are also not explored in depth and are the subject of another good practice note.<sup>5</sup>

## 1.2. How to use this good practice note

This good practice note aims to highlight the most important risks to and impacts on women and girls, and provides practical tools to help clients and consultants identify and respond to them in EBRD and EIB investments. This note is intended not as an exhaustive mapping of gender risks and impacts, but rather as a framework for guiding the approach to identification and response, which could then be tailored to specific project contexts.

This note can help EBRD and EIB clients and consultants understand:

- why it is important to identify and respond to gender risks and impacts in operations
- how organisations and their consultants can design and operate projects with gender in mind.

The good practice note includes a collection of practical tools to help organisations identify, assess and respond to gender-related risks and impacts. These tools are contained in an annex and are cross-referenced throughout the note itself. Alongside the tools, the note provides signposts to other relevant resources offering more information on specific topics.

While the practical steps outlined in this note are ones that clients can take during due diligence associated with EBRD or EIB financing, they can be taken at any time in the lead up to or following investment. The good practice note sets out a diagnostic or “health-check” process for identifying and addressing areas where companies can improve processes and approaches to enable all parts of the organisation to perform in line with EBRD and EIB requirements.

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<sup>5</sup> See EBRD, IFC and CDC (2020).

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## 2. How are gender risks and impacts relevant to EBRD and EIB investments?

### 2.1. How gender risks and impacts arise in EBRD and EIB investments

Unequal power relations between women and men in society mean there are likely to be gender-differentiated risks and impacts at project level in most geographical contexts. Women are typically overrepresented in informal and precarious forms of employment and underrepresented in managerial positions in the workplace and decision-making roles in the community. Their participation in the economy and public life is commonly shaped by their role in unpaid care work, which is often not recognised and undervalued. Similarly, women are generally underrepresented in community and civic decision-making structures. This may impact their ability to influence and benefit from a project as community members.

Widespread gender inequality means that women are typically more likely to be in situations of vulnerability than men, but when assessing gender-related risks and impacts, other personal characteristics can also be taken into account, including employment status, age, ethnicity, migration status, disability, sexual orientation, religion and marital/parental status. For example, risks of gender-based discrimination may be higher for women with caring responsibilities, those in rural areas, from minority groups, migrant women or women with disabilities.

### 2.2. EBRD and EIB E&S policy requirements regarding gender

The EBRD's 2024 ESRs and the EIB's 2022 Environmental and Social Standards are both based on overarching commitments to ensuring gender equality, and both contain specific requirements for clients to incorporate gender considerations into project due diligence, as well as to treat gender as a cross-cutting theme to be taken into consideration in the application of all E&S requirements.



#### Key EIB requirements with regard to gender

Standard 7 of the EIB Group's 2022 Environmental and Social Standards<sup>6</sup> concerns "vulnerable groups, Indigenous Peoples and gender". This standard emphasises the responsibility of clients to assess and manage project impacts, risks and opportunities relating to all persons or groups that are vulnerable, marginalised or may be discriminated against as a result of socioeconomic characteristics, including – but not restricted to – gender, indigenous status and ethnicity.

With regard to gender, Standard 7 outlines a cross-cutting requirement to: "adopt a gender-responsive approach to the identification, management, and monitoring of environmental and social impacts and risks that takes into account the rights and interests of women and girls, men and boys, and non-binary and gender non-conforming persons, including specific attention to the differential burdens, barriers and impacts that they might experience, including gender-based violence and harassment" (7.16).

In addition to Standard 7, there are specific references to gender risks incorporated throughout the EIB Standards, including in relation to how clients manage the process of stakeholder engagement and consultation (Standard 2), labour rights (Standard 8) and communities (Standard 6).

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<sup>6</sup> See EIB (2022).

### Key EBRD requirements regarding gender

Under the EBRD's ESRs,<sup>7</sup> clients are required to identify any potential gender-specific and disproportionate adverse impacts and develop mitigation measures (ESR 1).

They must also identify and respond to impacts on vulnerable people, defined as those who may be disproportionately affected by project impacts or more limited in their ability to access project benefits, with gender as a key factor influencing vulnerability. This is particularly significant for stakeholder engagement and grievance management processes established under the ESRs.

ESR 2 sets out requirements to ensure fair treatment, non-discrimination, non-harassment and equal opportunities for all project workers. ESR 4 requires clients to identify and assess gender-related risks that have specific physical, physiological and psychological effects on project workers. Together, ESR 2 and ESR 4 specifically require EBRD clients to adopt measures to prevent and address GBVH and child sexual exploitation and abuse in relation to EBRD-financed projects.

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## 2.3. The benefits of applying a gender lens to project due diligence

Organisations that effectively identify and assess gender risks during project due diligence are better placed to anticipate the different impacts of business operations and activities on women and men, thereby strengthening the investment proposition. They can make the necessary adjustments to ensure their business operations support, and do not undermine, gender equality and avoid potential negative impacts on the project workforce, affected communities and intended project beneficiaries. Applying a gender lens to project due diligence also helps to identify vulnerable groups, recognising that gender often serves as a key determinant of an individual's susceptibility to adverse impacts.

By designing and implementing stronger management systems based on an enhanced understanding of gender-differentiated E&S risks and impacts, organisations can reap the wider benefits for their operations (see **Figure 1**).

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<sup>7</sup> See EBRD (2024a).

Figure 1. Organisational benefits associated with robust assessment and management of gender risks and impacts

Demonstrate compliance with statutory requirements	Strong systems for identifying and responding to gender risks and impacts mean that companies are better positioned to demonstrate compliance with requirements under national or local law.
Meet lender requirements	All leading development finance institutions and investors, across all markets, increasingly require evidence from their clients of effective gender risk management systems.
Strengthen overall risk management and reduce costs	Having the right management systems in place helps organisations identify and respond to risks early on, before they materialise as adverse impacts or escalate into time-consuming and costly grievances or legal challenges. This can help reduce the time spent by senior staff on grievance management or litigation, and the costs associated with potential compensation.
Build trust and credibility with stakeholders, including project-affected communities and workers	Companies that proactively anticipate and respond to gender risks and impacts in their operations build higher levels of trust and credibility with key stakeholders, including project-affected communities and workers, with benefits for outreach and ongoing relations.
Strengthen people management outcomes	Identifying and responding to gender risks and impacts can help ensure higher productivity, better recruitment outcomes, lower staff turnover and less absenteeism.
Be a champion for gender equality	Prior to investing, companies may have already made their own commitments to promoting gender equality in their operations. Aligning with lender requirements on gender can help them reinforce and showcase their existing interventions to support gender equality.

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## 3. Incorporating gender into project E&S due diligence

### 3.1. Overview

Both the EBRD, under ESR 1, and the EIB, under Standard 1, have E&S due diligence processes in place, where the onus is on the client to undertake risk assessment, establish adequate management systems and monitor project performance in relation to E&S requirements.

In line with these standards, gender risk identification and assessment is considered a cross-cutting requirement and incorporated into wider E&S due diligence (see **Figure 2**). It informs the development of planning and management documents, including – where relevant – a project E&S management plan. **It should not be considered a separate process or new requirement.**

Once E&S risks have been identified (including gender risks), project teams can work on developing the right management systems to enable companies to respond to and mitigate risks (see Section 5 on “Mitigating gender risks and impacts through management systems”). These management systems, and the data collection they enable, position clients to be able to report on the ongoing management of risks, as required by both the EBRD and the EIB.

This section focuses on the overarching process for identifying, assessing and managing gender risks in the ESDD process, with signposting to other sections, resources and tools that are relevant to this process, including stakeholder consultation as an important source of information.

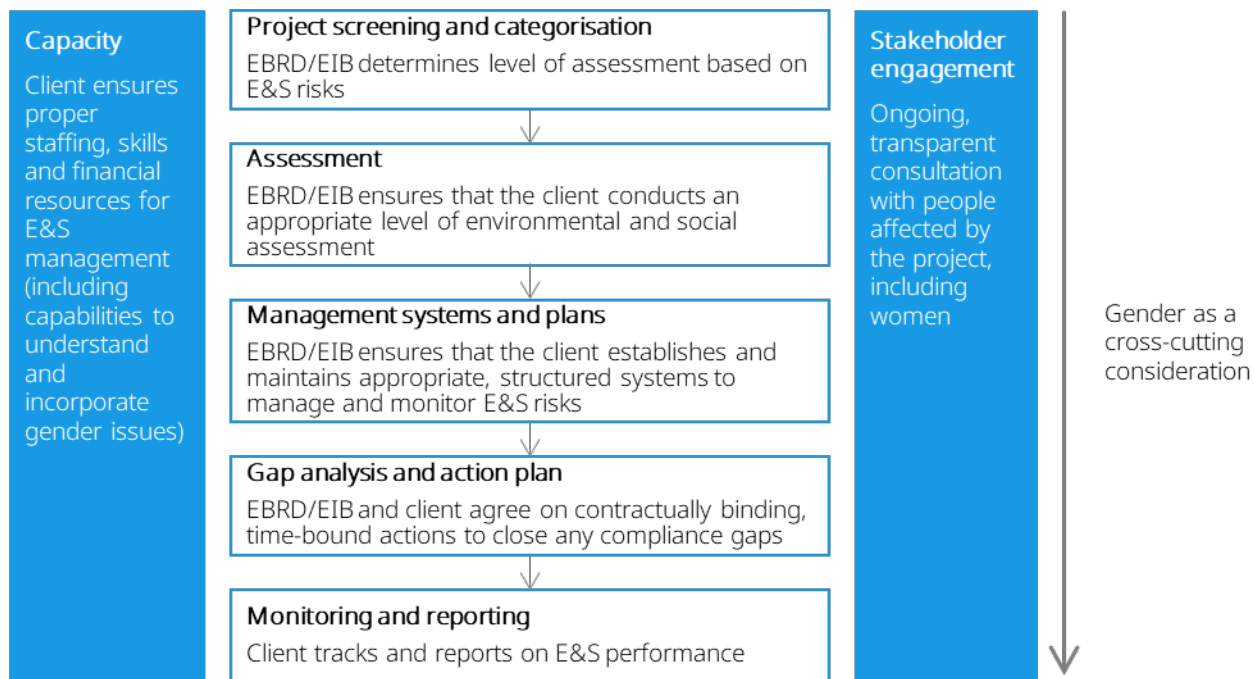
#### What is a project?

A project is a set of planned works or activities to be completed over a period of time that is intended to achieve a particular purpose and for which investor financing is sought by an investee. Projects can be led by private- or public-sector partners and span a range of different sectors. A project may involve building something new (greenfield) or improving or expanding existing infrastructure or operations (brownfield).

Gender (and other E&S) risks and impacts can vary considerably by project, depending on its nature and where it is located. Examples of projects include:

- modernising a city's tram or metro system to improve urban mobility and reduce emissions
- constructing a new wind farm to supply clean energy to the national grid
- upgrading wastewater treatment facilities to meet European Union (EU) environmental standards
- providing a credit line to a local bank to support small and medium-sized enterprises
- constructing energy-efficient social housing in an expanding urban area
- extending a food processing facility that sources from local farmers.

**Figure 2. Gender as a cross-cutting requirement in project due diligence**



### 3.2. Project screening and categorisation

The EBRD and the EIB screen projects to identify potential impacts and risks, and thereby determine the scope and depth of subsequent ESDD with clients. This screening informs the need for an environmental and social impact assessment (ESIA) or other studies. **Figure 3** illustrates the categorisation systems used by the two institutions.

**Figure 3. How the EBRD and the EIB categorise E&S impact**

	Higher overall E&S impact	→	Lower overall E&S impact
<b>EBRD</b>	<p><b>Category A</b></p> <p>Could result in potentially significant E&amp;S impacts that are new and additional and cannot be readily identified, assessed or mitigated.</p> <p>Requires formalised and participatory ESIA.</p>		<p><b>Category B</b></p> <p>Potential E&amp;S impacts are typically site-specific and/or readily identified and addressed through mitigation measures.</p> <p>Requires targeted assessment, with scope determined on a case-by-case basis.</p>
			<p><b>Category C</b></p> <p>Likely to have limited environmental and/or social impacts that can be readily identified and mitigated.</p>
<b>EIB</b>	<p><b>High risk</b></p> <p>Likely to have significant environmental, climate and/or social impacts and risks.</p> <p>Requires the preparation of an environmental impact assessment (EIA)/ESIA and/or any relevant report pertaining to specific topics as required by law or determination of appropriate authorities.</p>		<p><b>Medium risk</b></p> <p>Likely to have moderate/limited adverse environmental, climate and/or social impacts and risks that might be addressed through the application of a mitigation hierarchy and for which the competent authorities in the host country and/or the EIB has determined that the preparation of an EIA/ESIA report is not required.</p>
			<p><b>Low risk</b></p> <p>Likely to result in minor or no adverse environmental, climate and/or social impacts and risks.</p>



- An overall lower E&S categorisation and/or risk rating is not to be seen as an indicator that gender risks are not present.
  - Risks and impacts relating to women and girls may be significant in those projects that are otherwise assessed as presenting low or lower E&S risks (for example, risks of discrimination or harassment as a result of prevailing social norms). Moreover, the likelihood of these risks arising can change substantially over the course of the project.
  - Following is a set of practical steps for clients to assess and mitigate gender risks, irrespective of the overall E&S categorisation of a project.
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### 3.3. Assessment

Clients are responsible for conducting an appropriate level of E&S assessment, proportionate to the project's risks and potential impacts. The assessment must identify all relevant E&S risks, including those relating to gender. It must cover direct, indirect, cumulative and transboundary impacts, and must address impacts on vulnerable groups and women.

Assessments can take different forms. Typically, for large, greenfield projects with potentially significant E&S impacts, an ESIA is appropriate, as it includes detailed baseline studies and usually covers cumulative impact assessments, contextual and human rights risk assessments or climate risk assessments, among other things. Clients are encouraged to consider gender (including GBVH) in the assessment of E&S risks and impacts based on a gender-disaggregated baseline, monitoring data and consultation. It is imperative that these gender-related data are presented in the context of accompanying analysis, to enable all parties to understand how the data inform the project's potential gender risk profile.

As part of the E&S assessment process required by EIB Standard 1 and EBRD ESR 1, clients are expected to consider contextual risks and how they may evolve over time. From a gender perspective, "contextual risks" are elements and actors in the local context that may increase or decrease the likelihood or severity of risks to women and girls. They may include the capacity of actors responsible for project delivery, historical patterns of discrimination or treatment of parts of the community, conflict and violence, or other tensions. It is important to note that some gender risks may be difficult to eliminate within the project if their underlying causes are beyond the project team's control.



The assessment serves as a key tool to enable project teams to take appropriate steps to manage risks and potential impacts relating to gender throughout the project cycle by developing tailored prevention, minimisation, mitigation and/or compensation measures.

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**Additional guidance:** see Section 4 for guidance on identifying and assessing gender-related risks, including:

- screening and scoping gender risks, and establishing a meaningful gender baseline
  - factoring gender into assessment planning
  - assessing and prioritising gender-related risks
  - determining the need for further, tailored risk assessment in relation to gender.
- 

### 3.4. Management systems and plans

The requirements of both the EBRD and the EIB oblige clients to establish an integrated environmental and social management system (ESMS) or equivalent as a dynamic, adaptable and continuous process that is commensurate with the size and nature of the risks and potential impacts of the full project lifecycle. The ESMS must also detail the monitoring and reporting systems that will apply to the project.

It is crucial that all gender-related risks are carefully identified and incorporated into the ESMS. The ESMS is typically accompanied by policies and procedures and refers to a project-specific environmental and social management plan (ESMP) that details actions to be undertaken in relation to gender risks identified during the ESDD. In addition, the ESMS incorporates such instruments as grievance redress mechanisms, a stakeholder engagement plan (SEP), an emergency preparedness and response plan, and other measures, as required.

Where the project entails significant third-party activities, the ESMS could also encompass procurement, contractor or supply-chain management frameworks. In some contexts, such as large-scale infrastructure or multi-site projects, it may also be necessary to specify gender-related mitigation plans in contractor- or site-specific ESMPs.

Mitigation measures developed by the client, including any other thematic environmental and social management plans required under specific standards (such as a resettlement action plan, a health, safety and security management plan, or a labour corrective action plan), are components of the project ESMS. Measures to avoid, minimise or mitigate gender-related impacts could be included in all relevant thematic E&S management plans.



**Additional guidance:** see Section 5 on “Mitigating gender risks and impacts through management systems” for further guidance on how to embed gender into management systems relating to:

- the workplace
- communities
- procurement
- land acquisition and involuntary resettlement
- environment and climate.

### 3.5. Gap analysis and action plan

Where the project does not meet the E&S requirements of the EBRD or the EIB, or where gaps or weaknesses are identified during both the appraisal stage and, later, project implementation and monitoring, both institutions require the client to develop time-bound corrective actions to achieve compliance, alongside monitoring indicators, and roles and responsibilities.

For the EBRD, these form the ESAP (environmental and social action plan); for the EIB, they constitute the environmental and social commitment plan (ESCP). In both cases, the ESAP/ESCP forms part of the financing contract and is a binding element of the legal agreement. All clients are expected to meet commitments included in the ESAP/ESCP, and monitor and report progress to the lenders.

Examples of time-bound corrective actions relating to gender are set out in **Table 1**.

**Table 1. Sample actions to mitigate gender risks**

Policy development	<ul style="list-style-type: none"> <li>• Developing or updating policies in line with EBRD and EIB requirements</li> <li>• Incorporating gender considerations into the ESMS</li> <li>• Conducting a gender baseline assessment to identify existing gaps and risks</li> </ul>
Workplace practices and human resources (HR)	<ul style="list-style-type: none"> <li>• Implementing non-discriminatory recruitment and promotion policies, and training the staff concerned</li> <li>• Establishing mechanisms for reporting and addressing reports of GBVH</li> <li>• Conducting training for staff and management on non-discrimination policies and procedures</li> <li>• Providing workplace organisation and welfare facilities, including site-management plans and worker accommodation plans</li> </ul>
Contractor management	<ul style="list-style-type: none"> <li>• Non-discrimination clauses in procurement contracts</li> <li>• Monitoring contractors’ compliance with GBVH prevention protocols</li> </ul>
Project-affected communities	<ul style="list-style-type: none"> <li>• Promoting gender-balanced employment opportunities within the project</li> <li>• Creating accessible, culturally appropriate and confidential grievance mechanisms</li> <li>• Helping women diversify their livelihoods through access to microfinance, business development support and markets</li> <li>• Fostering partnerships with local women’s groups, non-governmental organisations (NGOs) and social organisations</li> </ul>
Stakeholder engagement	<ul style="list-style-type: none"> <li>• Ensuring women are actively engaged as stakeholders and that consultation methods are gender-sensitive</li> </ul>

- Including gender-disaggregated data collection in impact assessments, and community monitoring
- Developing gender-sensitive livelihood restoration programmes, especially in projects involving land acquisition or resettlement

Monitoring and reporting	<ul style="list-style-type: none"> <li>• Reporting annually on gender KPIs</li> <li>• Appointing a gender focal point or establishing a working group to coordinate implementation of gender-related ESAP actions</li> <li>• Conducting periodic audits or assessments of performance in relation to gender requirements, including by third parties</li> </ul>
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Where there are significant project or contextual risks relating to gender, a standalone gender action plan may be required. Key actions and monitoring requirements may also be incorporated into the ESAP. Gender action plans should always be time-bound, adequately resourced and tailored to the specific operational circumstances and gender risks associated with each project. Tool 6 sets out key principles for developing a gender action plan and includes a template featuring sample actions (see Annex).



**Additional guidance:** for practical information on implementing specific ESAP/ESCP action items, see:

- Section 5 on “Mitigating gender risks and impacts through management systems”
- Section 3.8 on “Organisational capacity and resources”
- Section 6 on “Incorporating gender considerations into stakeholder engagement processes”
- Section 9 on “Monitoring and reporting”.

### 3.6. Monitoring and reporting

Clients must monitor the project’s E&S performance against the commitments in the ESMS and ESAP/ESCP. Note that some EBRD and EIB standards entail specific monitoring requirements: for instance, EIB Standard 8 (Labour rights) requires clients outside EU jurisdictions to conduct regular monitoring and reviews of the project’s workforce, including contractors, subcontractors and primary suppliers.



The ESMS need to be adaptable, allowing for updates as new risks or impacts emerge. Independent audits, including gender audits or assessments, may be requested by the EBRD and the EIB for higher-risk projects.

Both the EBRD and the EIB typically require clients to submit E&S reports at least annually or more regularly in high-risk or highly dynamic contexts. Where clients are subject to annual E&S monitoring requirements, these often involve the collection of gender-disaggregated data.

Clients are required to notify both institutions of E&S-related accidents and incidents, including incidents of GBVH, in a timely manner.<sup>8</sup> Reporting requirements for serious E&S incidents – including GBVH incidents – are also routinely incorporated into loan agreements.



**Additional guidance:** see Section 9 on “Monitoring and reporting” for further details of how to account for gender when designing and implementing monitoring and reporting systems.

### 3.7. Stakeholder engagement and disclosure

Both the EBRD and the EIB emphasise the importance of early and continuous engagement with stakeholders, including through public consultation. Engagement must be meaningful, inclusive and culturally appropriate, paying particular attention to the needs and views of vulnerable and marginalised groups, which may include women and girls. (The views of those aged under 18 years should be gathered through consultation with parents, guardians and representative

<sup>8</sup> See, for example, Standard 1.28 in EIB (2022).

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organisations, such as schools or youth organisations; children themselves should not be directly involved in stakeholder consultations.) Where required, a formal stakeholder engagement plan (SEP) must be developed and implemented.

The aim of engaging with project-affected and vulnerable groups, including women, should be to identify potential harms to their rights and to reflect their perspectives in risk response. Clients should seek to identify and address barriers to access that may limit the ability of such groups to engage by holding meetings in places that can be easily reached by all stakeholders and at convenient times, having female facilitators and engaging interpreters where language barriers might be a problem.

Where possible, clients should engage with affected groups early to strengthen their relationship with them, build trust and enable meaningful future engagement. This relationship can be called upon later when impacts occur or particular needs arise, but it cannot be built by engaging only at those times.

For higher-risk projects, the EBRD and the EIB commonly require public disclosure of both ESIA and ESMP documentation prior to approval by the financing party.



**Additional guidance:** see Section 6 on “Incorporating gender considerations into stakeholder engagement processes”.

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### 3.8. Organisational capacity and resources

Clients are encouraged to allocate sufficient staffing and suitable expertise to implement E&S commitments with regard to gender, with clear responsibilities and accountability for E&S performance. They must assign adequate budget and resources for E&S management and stakeholder engagement. This could include providing gender training for staff with key responsibilities (such as human resources (HR)), ensuring that staff are given additional time to deal with gender-related responsibilities (rather than simply adding to their existing workload), or appointing dedicated gender focal points or “champions” within the organisation.



Implementing E&S commitments on gender is most likely to succeed where there is clear and ongoing commitment from senior leadership, and the staff responsible are given adequate time and resources to fulfil their duties.

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**Additional guidance:** organisational capacity and resources is a cross-cutting consideration in project design and management. For further information, see:

- Section 7 on “Making gender-related risk management part of ongoing operations”
  - Section 8 on “Responding to adverse gender impacts”
  - Section 9 on “Monitoring and reporting”.
- 

#### Practical tips for incorporating gender into project E&S due diligence

- Ensure that all risk assessment is tailored to the operational circumstances of the project and takes into account key contextual risks, including the capacity of actors responsible for project delivery, historical patterns of discrimination or treatment of parts of the community, conflict and violence, or other tensions.
- Plan stakeholder engagement carefully, so it is designed in a meaningful, inclusive and culturally appropriate manner, with a particular focus on the needs and views of vulnerable and marginalised groups, which may include women and girls.
- Following assessment, establish and maintain systems to manage, monitor and report on E&S risks.
- Develop time-bound corrective actions to achieve compliance where the project does not meet EBRD or EIB E&S requirements, or where gaps or weaknesses are identified. For projects that present significant gender risks, a discrete gender action plan may be necessary.
- Allocate sufficient staffing and resources (including budget and time) for E&S management, including with regard to gender risks.

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## 4. Identifying and assessing gender-related risks

The EBRD and the EIB recognise the importance of conducting a holistic assessment to identify E&S risks and impacts – including those relating to gender – associated with projects and clients' management of E&S performance throughout the lifecycle of those projects. Assessment should be commensurate with the nature and scale of the project and proportionate to its potential impacts and risks. It is therefore important to screen and scope the risks to people, to facilitate identification of direct and indirect E&S risks.

From a gender perspective, this means screening and scoping gender-related risks, by collating adequate contextual information for understanding and evaluating potential adverse impacts from the project and existing risks to women, in order to inform and focus subsequent mitigation measures. Doing so can provide answers to the following questions:

- How might project activities exacerbate (or mitigate) gender-related risks, also in view of intersectionality, that is, how gender interacts with age, ethnicity, disability, economic status and other personal characteristics?
- How might gender create differing exposure or vulnerability to E&S impacts and vectors, such as climate change, displacement, labour influx or occupational segregation, and how might E&S changes affect women and men differently?
- Is it necessary to adjust impact significance ratings based on gender-differentiated vulnerabilities?
- How can a gender focus help shape better mitigation strategies?

### 4.1. Screening for gender-related risks

Screening determines whether the project has significant gender-related impacts (as well as opportunities). It includes a mapping of expected project activities and a preliminary analysis of how these activities might affect women and men differently – in the **project workforce**, in **affected communities**, including as **service users**, and/or as other project beneficiaries. This initial mapping could involve desk research on social norms that are likely to influence how women and girls are affected by the project. It could also identify whether the project is in a sector or location where women may be disproportionately affected.

Screening could also include a mapping of legal requirements in relation to gender-related risks. While national laws may create compliance obligations for projects/clients, they also shape the broader social context and can highlight gender-specific risks that extend beyond the project's direct control. Gender risks may arise where:

- discriminatory laws exist that affect the project, such as restrictions on women's participation in certain jobs or types of work, or on women's ownership of land and property
- national laws do not fully protect women from discrimination or adequately penalise offenders, because the laws are silent on or only partially address gender-based discrimination or harassment.

Project teams could also refer to relevant **lender requirements** in their initial identification of gender risks. This might include mapping such requirements to identify which are relevant to gender in the context of the project (see Section 2.2 on "EBRD and EIB E&S policy requirements regarding gender"). As a starting point, project teams can cross-reference lender requirements against their initial assessment of project risk to identify key gaps (such as missing information, disparities in existing project policies or management systems, or insufficient technical and human capacity within the project team).

Where the E&S assessment involves fieldwork, this initial mapping should be tested when engaging with stakeholders and may also help inform planning (by identifying which groups are most likely to be affected, for example). See **Table 2** for the key steps involved in identifying both contextual and project-specific risks relating to gender, and specifically those relating to the workforce (including contractors and suppliers) and project-affected communities.



Screening provides a foundation for understanding how women and men may be affected differently by expected project activities and helps highlight key areas for further gender analysis as the project evolves. Screening does not require full and comprehensive project documentation; it can be carried out with only basic information about the key objectives, location and sector for the project.



- TOOL 1 provides useful sources for collecting relevant demographic, social and economic information.
- TOOL 2 provides an overview of indicative gender-related risks in a range of specific sectors.
- TOOL 3 provides guidance on key areas of national law to consider.

## 4.2. Scoping

Scoping is important to help identify where and how gender risks should be examined in the project due diligence. It helps set the focus of the assessment and makes sure gender issues are carefully considered.

### 4.2.1. Identify risks relating to gender and meet relevant E&S standards

Gender is a driver of risk and potential vulnerability to adverse project impacts across the spectrum of E&S themes outlined in EBRD and EIB requirements. **Table 2** sets out key gender risks that could be taken into consideration in the application of EBRD and EIB E&S requirements.

**Table 2. Key gender risks to consider when applying EBRD and EIB E&S requirements**

Topic	EBRD ESRs/ EIB Standards	Overview of key gender risks
Assessment and management of all E&S risks and impacts	EBRD ESR 1 EIB Standard 1	<p>There are significant gender risks associated with the overarching process to assess and manage all E&amp;S risks and impacts. Failure to consider differentiated risks to or impacts on women and men can lead to inadequate safeguards for women and girls throughout the project lifecycle.</p> <p>Gender gaps in the processes relating to risk assessment, stakeholder consultation, information dissemination and community grievances can have significant implications for the assessment and management of risks and impacts across all topics, including working conditions, land and resettlement, communities, and environment and climate.</p>
Working conditions	EBRD ESR 2 EIB Standard 8	<p>Gender discrimination and GBVH in the workplace are major challenges and should always be treated as risk issues in all countries and sectors.</p> <p>Traditional or prevalent views about women's roles and abilities often contribute to discrimination against women in the workplace. Discrimination can occur at every stage of the employment relationship and is often closely linked to actual or presumed pregnancy, maternity and care responsibilities.</p> <p>Drivers of GBVH in the workplace often include power imbalances, discriminatory social norms, inadequate legal frameworks, and weak workplace policies or enforcement mechanisms.</p>
Communities and external engagement	EBRD ESR 4 EBRD ESR 10 EIB Standard 9	<p>In many communities, men and women have distinct roles and responsibilities, which means that their health, safety and personal security can be affected differently by project activities.</p> <p>GBVH in project-affected communities is a key risk, particularly for investments that involve large-scale infrastructure development and natural resources, and for major works that involve significant labour influx. Risks are heightened in small, remote communities or fragile (post-)conflict areas.</p>

Topic	EBRD ESRs/ EIB Standards	Overview of key gender risks
Land and resettlement	EBRD ESR 5 EIB Standard 6	<p>Project teams should always consider that land acquisition, displacement and resettlement often affect women and men differently. Women typically have less access to land ownership than men, and compensation processes are frequently applied at the household level and controlled by husbands.</p> <p>Risks of adverse outcomes are heightened where stakeholder engagement and community grievance mechanisms relating to land fail to capture women's perspectives. This may be due to, for instance, inadequate consideration of women's land interests or reliance on common property, customary land rights, ecosystem services and social infrastructure.</p>
Environment and climate	EBRD ESR 3 and ESR 6 EIB Standards 3, 4 and 5	<p>Gendered roles in households, resource use or management and workplaces mean that women may, because of their daily routines, experience different risks resulting from climate change and environmental factors. For instance, in some communities, women and girls are responsible for collecting water from and washing clothes in or near local waterways, which makes them more vulnerable to the effects of pollution near these sites.</p> <p>In rural communities, women often depend on natural resources for food and fuel, and they may be negatively affected if there is interference with those resources and local ecosystems. This overlaps with considerations regarding land and resettlement, given that loss of access to natural resources may affect livelihoods and cause economic displacement.</p>

### Identifying and responding to risks to sexual and gender minorities in project due diligence

Across the world, sexual and gender minorities continue to face legal discrimination, social stigma, harassment or violence, placing them at heightened risk of adverse impacts in the context of EBRD and EIB investments. As such, project due diligence should take into account specific risks and impacts relating to sexual orientation and gender identity (SOGI), in line with EBRD and EIB E&S policies, which seek to prevent discrimination on the grounds of SOGI and recognise that sexual and gender minorities may be disproportionately impacted by projects.

It is important when assessing risks and impacts relating to SOGI to take care to avoid exposing individuals or groups to harm, especially where same-sex sexual relations are criminalised or where there is strong social stigma associated with sexual and gender minorities. In most cases, data on sexual and gender minorities are lacking, because the social stigma, discrimination and harassment faced by these groups mean that individuals often choose not to disclose their sexual orientation or gender identity. However, data that measure broader gender equality outcomes may serve as a proxy for assessing risk, in that more rigid gender norms are likely to indicate higher levels of risk for sexual and gender minorities (see Tool 1 in the Annex for sources of international gender data).

Project teams should endeavour to avoid harm when designing engagement with sexual and gender minorities, by ensuring they have a clear understanding of local legal and policy frameworks, consulting research on prevailing gender norms and following protocols to ensure that all interviews and stakeholder consultations are culturally appropriate. Interviewers should treat information with confidentiality and avoid asking questions of a personal nature, including with regard to SOGI. In some jurisdictions, there are strict reporting requirements regarding certain types of information, so interviewers should check for these and consider them when preparing for interviews. In such contexts, it may also be advisable to consult local NGOs and LGBTQI+ (lesbian, gay, bisexual, transgender, queer, intersex and other identities) organisations to understand contextual risks for sexual and gender minorities.

Measures to respond to SOGI risks should be appropriate to the local legal context and gender norms. They should not rely on identifying sexual or gender minorities or assume that LGBTQI+ people will feel safe accessing workplace and community grievance mechanisms. Measures may include, for instance, strengthening wider policies and practices to prevent discrimination and GBVH, and ensuring that employees or community members are never asked for unnecessary personal data (including with regard to health monitoring).

## 4.2.2. Incorporate gender into assessment planning, including terms of reference for E&S consultants

As clients are responsible for conducting – and, where appropriate, commissioning – assessments, it is vital that gender-related risks are clearly scoped in the specifications for E&S assessment and, where necessary, specific expertise and approaches are deployed to ensure that gender is adequately and competently incorporated into the assessment.

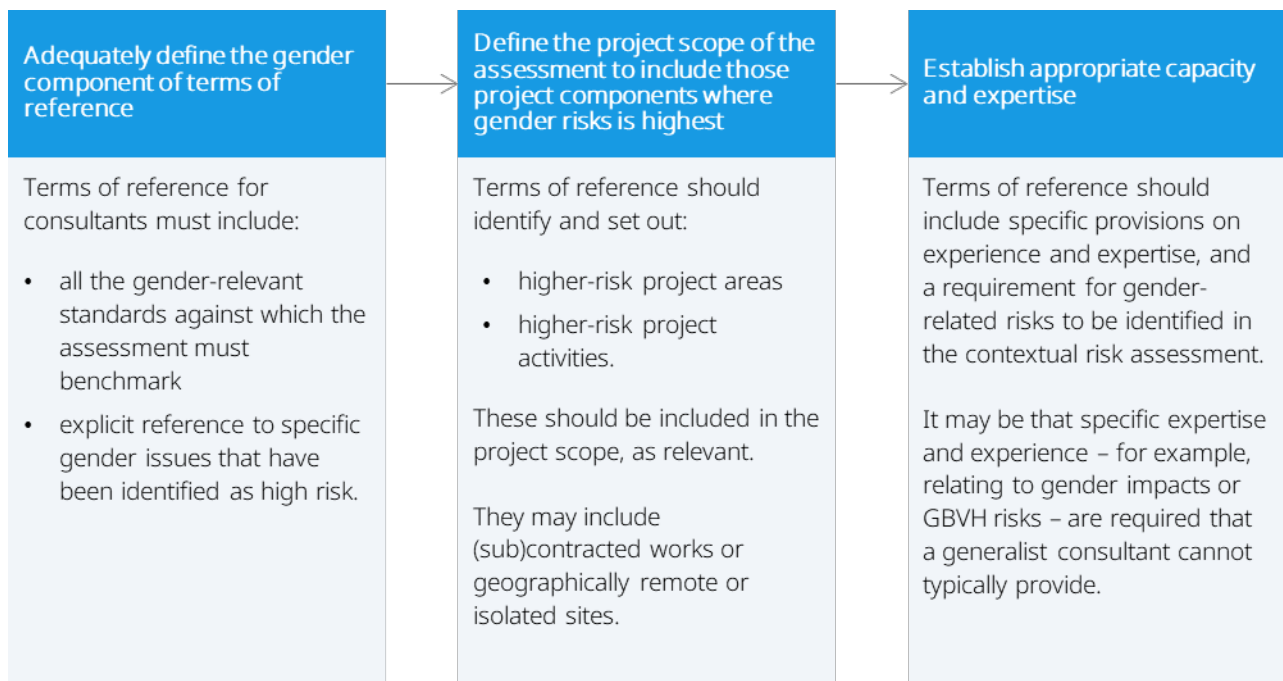
In many projects, E&S consultants play a key role in meaningfully identifying gender risks and appropriate mitigants. Although clients have overall ownership of the E&S assessment process, external specialised expertise can sometimes be necessary, particularly for large or higher-risk projects.

Because gender is treated as a cross-cutting theme in EBRD and EIB standards, it should always be clearly identified as a key consideration in the terms of reference for all E&S consultants, and all client ESDD teams are encouraged to have the capacity to address gender issues. Key considerations include:

- **The expertise and gender composition of the E&S team:** team structure is very important, particularly where screening and initial risk assessment have identified significant gender risks. It is good practice to ensure women are adequately represented on all E&S teams and among consultants carrying out due diligence and monitoring, particularly where there is direct engagement and focus-group discussions (FGDs) with project-affected women. In some social contexts, it may be more difficult for men to establish a rapport with and elicit information from local women, particularly in relation to sensitive subjects.
- **Gender composition of the wider team:** if the E&S team itself does not include women, it may be possible to find ways to offset this – for instance, by using competent local female interpreters or facilitators, who are instructed in how to conduct FGDs.

Steps to ensure that gender is incorporated into the planning process when commissioning consultants – including in the context of ESIA, where they are required – are summarised in **Figure 4** (see also Section 3.2 on project screening and categorisation for details of when a project requires an ESIA or other specific assessments).

**Figure 4. Incorporating gender into the planning process when commissioning consultants**



- TOOL 5 provides guidance on content for gender requirements in the terms of reference for ESDD.
- TOOL 4 provides a checklist of gender considerations when planning a site visit.

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### 4.3. Develop a gender-disaggregated and gender-informed baseline

Depending on the project context, the EBRD and the EIB may recommend compiling a baseline. Even if this is not a formal requirement, however, a robust and inclusive evidence base helps determine what impacts the project might create, exacerbate or mitigate. It can also serve to highlight vulnerable groups, including women, and to pinpoint existing social tensions or inequalities. This enables more effective mitigation and management, as well as supporting future monitoring of project impacts and effectiveness of mitigation measures.

An effective baseline does require, however, active analysis of gender-disaggregated quantitative and qualitative data – in relation to, for example, employment, access to resources such as education, land and land use, health services and outcomes, decision-making authority and livelihood opportunities – to capture differentiated social, economic and environmental risks. This analysis can also serve to identify gender norms, power dynamics and decision-making roles in relation to the workforce, community or service users in the project context.

### 4.4. Depending on the project context, gathering baseline data may require a combination of the following:



Developing a gender-sensitive baseline requires the use of inclusive and gender-sensitive data collection and stakeholder engagement approaches, which can include same-sex interviewers and separate FGDs with women and marginalised gender groups.

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### 4.5. Assess and prioritise gender-related E&S risks

Clients should be able to use the initial identification of risks to determine and prioritise particular aspects of expected project activities to conduct a more detailed assessment of gender-related risks.

This will often start with a focus on potential risk issues related to “core” project activities; for example, activities or phases of the project that are longest in duration, involve or are likely to affect a large number of people (workers and project-affected communities) and/or activities that are central and fundamental to the project’s delivery. Project teams might also prioritise activities that are already known to pose specific gender-related risks.



Risk assessments should always consider how gender intersects with other personal characteristics to increase vulnerability to potential adverse impacts. Such characteristics include employment status, age, ethnicity, migration status, disability, sexual orientation, religion and marital/parental status. For example, risks of gender-based discrimination may be higher for migrant workers engaged on temporary contracts for seasonal work in rural areas than for local, white-collar female workers employed on permanent contracts.

The aim is to establish and verify the level of risk relating to gender associated with different aspects of the project. This would include an initial assessment of the likelihood and severity of any potential impacts, as well as of the stakeholder(s) affected – for example, women in local communities close to planned sites for large-scale construction activities. Note that where projects aim to take proactive measures – beyond compliance with lenders’ E&S requirements – to promote gender equality, the assessment would also consider any risks associated with these measures that may require mitigation (for example, where projects target higher levels of women’s employment in traditionally male-dominated occupations, there may be heightened risk of GBVH).

The format of the E&S assessment will depend on the project's categorisation and the outcomes of screening and scoping processes. The results of the assessment will lead to a list or matrix of identified risks and impacts associated with specific project activities. Risks should be linked to each specific project phase or activity (such as the construction phase), actors (contractors, local communities, road users and so on), locations (region, town and worksite) and, as relevant, lender requirements (regarding management systems, workforce management, community engagement and so on).

The assessment should pay close attention to gender risks in the workplace and in project-affected communities:

- **Gender risks in the workplace:** understanding the likely gender composition of the workforce is essential. While specific job roles and employment details may not be fully defined in some project contexts, such as greenfield projects, it is important to assess where gender disparities might arise in recruitment, job types and career advancement opportunities.
- **Gender risks in project-affected communities:** gathering information on women's roles in the local economy, their access to resources and their participation in decision-making can help identify areas where the project might have unequal impacts on women and men. This can also help to ensure that subsequent due diligence and risk management measures adequately account for gender differences in the affected communities.

Tables 3 and 4 set out some initial steps for assessing gender risks on the basis of document and desk reviews. Depending on the nature of the assessment, these findings may be supplemented by additional data collection, fieldwork and stakeholder engagement.

**Table 3. Identifying gender risks in the workplace**

Steps to undertake	Possible sources of information	Indicators of gender-related risks
<ul style="list-style-type: none"> <li>• Identify the types of jobs likely to be needed for the project (for example, technical, managerial, administrative), based on similar projects or industry standards</li> <li>• Identify the likely recruitment channels for engaging workers on the project</li> <li>• Estimate the likely gender distribution in these roles, drawing on knowledge of the local labour market and previous projects in the area or sector, including how this might change during the project lifecycle</li> <li>• Consider potential barriers that may limit women's participation in higher-paying or technical roles</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Project documentation</b> (such as project descriptions, previous risk or impact assessments)</li> <li>• <b>Statistical data</b> from national government agencies (such as employment and economic indicators)</li> <li>• <b>Online searches</b> – in English and the local language(s) – of international, local and social media and other relevant sources (reporting by civil society or worker organisations, for example)</li> <li>• <b>Existing knowledge and expertise in the project team</b> regarding previous projects or industry standards, knowledge of the local labour market and prevalent cultural norms</li> </ul>	<p><b>Contextual</b></p> <ul style="list-style-type: none"> <li>• In the country or region where the project is located, social and cultural norms are known to contribute to different opportunities, experiences or outcomes for women and men in areas such as employment, finance, property/land ownership and participation in community decision-making</li> <li>• A sector is associated with specific gender risks – for example, high levels of discrimination, significant publicly reported gender pay gaps or poor working conditions</li> <li>• Project operations are in conflict or post-conflict areas</li> </ul> <p><b>Project-specific</b></p> <ul style="list-style-type: none"> <li>• Features of the project that may indicate heightened risk – for example, remote worksites or planned workforce restructuring</li> </ul>

**Table 4. Identifying gender risks in affected communities**

Steps to undertake	Possible sources of information	Indicators of gender-related risks
<ul style="list-style-type: none"> <li>• Estimate the demographic makeup of local communities (such as number of women, men, children) potentially affected by project-related activities</li> <li>• Consider the typical economic roles of women and men in potentially affected communities, based on known information about local economic activities (such as agriculture, informal businesses, caregiving)</li> <li>• Identify potential gender-based barriers to accessing resources such as land, education or healthcare, using local cultural, social and political knowledge to understand whether and how these barriers affect women or men differently in the community</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Project documentation</b> (for example, project descriptions, previous risk or impact assessments)</li> <li>• <b>Targeted engagement</b> (for example, consultations, key informant interviews, FGDs)</li> <li>• <b>Statistical data</b> from local or national government sources (such as the national census)</li> <li>• <b>Online searches</b> – in English and local language(s) – of international, local and social media and other relevant sources (reporting by civil society or worker organisations, for example)</li> <li>• <b>Existing knowledge and expertise in the project team</b> regarding the local economy, project sector and prevalent cultural norms</li> </ul>	<p><b>Contextual</b></p> <ul style="list-style-type: none"> <li>• In the country or region where the project is located, social and cultural norms are known to contribute to different opportunities, experiences or outcomes for women and men in areas such as employment, finance, property/land ownership and participation in community decision-making</li> <li>• Any publications, campaigns, media reports or incidents that suggest gender-related concerns linked to the project location, sector or similar previous projects; consider intersectional risks, including those affecting Indigenous Peoples, ethnic minorities, children, young people and people with a disability</li> <li>• Project operations are in conflict or post-conflict areas, that is, the context gives rise to elevated intersectional risks (such as discrimination) and GBVH risks</li> </ul> <p><b>Project-specific</b></p> <ul style="list-style-type: none"> <li>• Features of the project that may indicate heightened risk, such as labour influx, resettlement/land acquisition, rural location with agriculture- and land-based livelihoods (local residents may not be able to easily benefit from jobs on the project and thus miss out on economic development)</li> </ul>



- TOOL 3 provides guidance on cross-sectoral and sectoral risks.
- TOOL 4 provides a checklist of gender considerations during site visits

**Case study: Ukraine fixed-mobile convergence financing project<sup>9</sup>**

**Evolving gender risks in a traditionally male-dominated sector**

The war in Ukraine has led to significant worker shortages and, as a result, employers are increasingly trying to attract women into traditionally male-dominated sectors and roles. In this context, it is crucial for employers to ensure that risk-assessment methodologies are regularly reviewed and updated to consider evolving gender risks in the workplace, and how they affect women and men in different ways.

The assessment of the EBRD’s investment in Datagroup-Volia-Lifecell identified possible risks for women entering operational roles that had previously been held solely by men. These risks included a lack of appropriately sized personal protective equipment for women, a lack of gender-segregated changing facilities, and personal security issues for women on site. By identifying these risks early during project due diligence, the client was better positioned to develop mitigating measures and ensure that women could be deployed in the roles in a timely and safe manner.

<sup>9</sup> See EBRD (2024b).

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## 4.6. Determine the need for further assessment of gender risks

Enhanced focus on gender-related risks is required where the screening, scoping and risk assessment process identifies heightened gender risks. In such cases, the EBRD and the EIB expect a gender impact assessment to be carried out, either as part of an ESIA or E&S assessment, as a standalone process, where required, or where the project is already beyond the assessment stage in its lifecycle. The nature of the enhanced focus on gender will vary according to the type of risk, but may include:

- collection of additional gender-disaggregated data
- focused consultation with stakeholder groups
- development of strategies to mitigate complex gender impacts.

Enhanced due diligence regarding gender risks and impacts may be required for the following:

- projects in fragile and conflict-affected regions or countries
- projects where there are known to be vulnerable or marginalised groups in local communities
- projects that may entail an influx of labour to the project site/surrounding communities
- projects in contexts where serious abuses have previously been reported
- projects where core functions depend on goods and materials from supply chains in which there is a high risk of harm to women workers
- projects in countries where laws are inconsistent with internationally recognised human rights principles and where civic space is under pressure
- projects that entail resettlement or expropriation.



TOOL 9 outlines additional resources that may be helpful in the context of an enhanced focus on gender during due diligence.

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### Practical tips for identifying and assessing gender-related risks

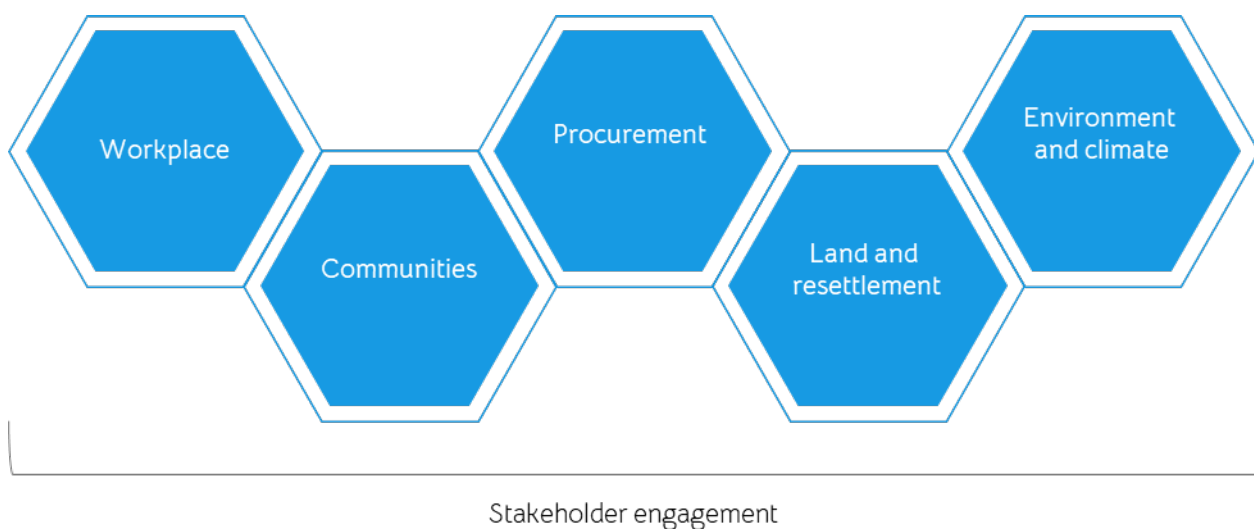
- Conduct an initial mapping of expected project activities and assess how these activities might affect women and men differently, with consideration given to the project workforce and project-affected communities, including as service users and/or as other project beneficiaries.
- Consider how gender intersects with other personal characteristics – including employment status, age, ethnicity, migration status, disability, sexual orientation, religion and marital/parental status – to increase vulnerability to adverse project impacts.
- Map national and local laws and lender requirements to identify gender-specific compliance obligations for projects/clients.
- Identify customary rules and social norms relevant to gender that may inform the identification of risks and shape the engagement process.
- Ensure that terms of reference for E&S consultants include an express requirement to consider gender as a cross-cutting theme and that E&S teams are gender-diverse and include appropriate gender expertise.
- Conduct a further, tailored risk assessment where there are heightened gender risks, including, for example, in the context of labour influx, presence of vulnerable or marginalised groups in local communities, or where projects are implemented in fragile or conflict-affected regions.
- When conducting due diligence with an enhanced gender focus, pay particular attention to “core” project activities, or activities that are known to pose specific gender risks, and consider the likelihood and severity of all impacts of project activities on women and girls.
- Ensure that identified gender risks are clearly and fully recorded in relevant project documentation and that all relevant risk information is reported to lenders.

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## 5. Mitigating gender risks and impacts through management systems

Strong management processes established in accordance with EBRD and EIB standards provide an important overarching framework for identifying gender-related risks and mitigating impacts in project due diligence. These management processes may be embedded ESMSs or ESMPs and based on gender considerations identified in impact assessments such as ESAs.<sup>10</sup> Developing and consistently implementing strong management systems is an effective way for clients to manage gender risks and impacts in their projects and operations and to demonstrate compliance with lender requirements. The term “management systems” is used here to describe the structures, processes and procedures that companies have in place to ensure smooth operations.

**Figure 5: Key management systems for addressing and responding to gender risks and impacts**



### 5.1. Mitigating gender risks and impacts in the workplace

Mitigating gender risks and impacts in the workplace contributes to projects' long-term social sustainability and operational success. Management systems that foster an equitable, inclusive and safe working environment for all (women and men alike) promote better recruitment, retention and productivity outcomes.

Workplace management systems describe how an organisation manages its workforce. While the exact form will vary from company to company, such systems typically include structures, policies and procedures relating to:

- recruitment
- labour and working conditions
- occupational safety and health (OSH)
- gender-based violence and harassment (GBVH).

**Table 5** sets out practical examples of how clients can explicitly incorporate gender considerations into management systems in each of these areas.

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<sup>10</sup> See EBRD (2024a), particularly ESR 1, and EIB (2022), particularly Standard 1, regarding the objectives and content of a successful ESMS.

**Table 5. How to incorporate gender considerations into management systems relevant to workplace impacts**

**Recruitment: policies and procedures describing how the organisation hires workers**

Overarching management systems on recruitment could address the following important elements:

- A job advertisement is developed for every job vacancy, containing a clear job description and focusing on the skills, experience and qualifications required for the role. Job advertisements and descriptions should not refer to applicants' gender, marital/family status or other personal characteristics that are irrelevant to the job.
- Pregnancy or other health testing is not a part of the recruitment process (except in the narrow range of circumstances where this is required for genuine health and safety reasons).
- Interview and recruitment panels include both men and women (where feasible), and there are clear interview protocols in place to ensure that interviewers do not ask questions of a personal nature (including with regard to marital/pregnancy status, family responsibilities or sexual orientation).
- Job selection is made on the basis of clear, pre-determined, objective criteria on what is necessary for the job in terms of experience and skills (and is clearly linked to the job description and advertised requirements).

**Labour and working conditions: policies and procedures describing how the organisation manages its employees**

Overarching management systems on labour and working conditions could address the following important elements:

- Policies and requirements (overarching HR policies or standalone) explicitly promote non-discrimination and equal opportunities. These set out procedures to ensure that men and women are treated equally in relation to working conditions (such as working hours, security of tenure, leave, safety and health measures, social security and other benefits) and pay (including additional payments, such as overtime, bonuses, allowances and in-kind benefits).
- There is a clear framework of job descriptions and performance reviews to ensure that remuneration and promotion are based on objective factors, such as an employee's skills, experience and responsibilities, and that women and men are paid the same wages for work of the same value.
- There are explicit policies and procedures relating to family-friendly working practices, including parental leave, flexible working arrangements and reasonable adaptations to work practices to account for pregnancy and nursing, to help workers reconcile work and family responsibilities.
- In relation to collective dismissal plans and procedures, selection criteria are objective and transparent do not disadvantage one group over another.



TOOL 8 sets out the key components of a workplace non-discrimination policy.

**OSH: policies and procedures describing how the organisation manages safety and health in the workplace**

Overarching management systems on OSH address the following important elements:

- In relation to risk assessments, it is explicitly recognised that women and men face different occupational hazards as a result of such factors as biological differences, societal roles and gender-based occupational segregation.
- In relation to risk management, differences between men and women are explicitly considered – for example, regarding personal protective equipment requirements.
- In relation to worker accommodation and facilities, there is explicit consideration of safeguarding (including the need for safe, secure and gender-segregated accommodation or travel arrangements), and appropriate sanitary and welfare facilities are provided for both men and women.

**GBVH: policies and procedures describing how the organisation manages risks of GBVH**

Overarching management systems on GBVH address the following important elements:

- Grievance mechanisms feature multiple contact points (both male and female) and reporting channels, and include options for anonymity, confidentiality protocols, safeguards against retaliation and support for survivors of GBVH (see also Section 7.3 on "Designing and implementing gender-sensitive grievance mechanisms for workers and project-affected communities").
- An employee code of conduct is developed that includes reference to GBVH and disciplinary consequences for perpetrators.



TOOL 7 sets out the key components of gender-sensitive grievance mechanisms for workers



**Additional guidance:** see EBRD, CDC and IFC (2020) for:

- a template for a workplace GBVH policy
- points to consider when developing GBVH grievance mechanisms and investigation procedures.

For how to strengthen GBVH policies and practices, see the *Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH)* guide.<sup>11</sup>

### Case study: Ukraine fixed-mobile convergence financing project

#### Promoting gender equality in recruitment and workplace practices

Datagroup-Volia-Lifecell, a Ukrainian telecommunications company, implemented a series of measures to foster a culture of gender equality, beginning with the recruitment process. The measures include the following:

- All job postings clearly state that the company is an equal opportunities employer that seeks to cultivate an inclusive work environment. Similarly, internal vacancy announcements reiterate the company's equality and diversity policies to ensure widespread awareness of its values in this regard.
- During the candidate screening stage, resumés from potential candidates may be shared with hiring managers in an anonymised format, that is, with personal identifiers such as names, photos, dates of birth and gender removed. This is intended to reduce potential unconscious bias and support more objective hiring decisions.

In parallel, the company has developed training materials for senior management on gender equality and non-discrimination, adopted principles of equal pay for equal work, conducted a review of internal policies and procedures, and incorporated gender equality and non-discrimination commitments into everyday business operations.

## 5.2. Mitigating gender risks and impacts in relation to communities

Effective management systems to mitigate gender risks and impacts in relation to communities are key to fostering local support for the project, ensuring that its benefits are more equitably distributed and avoiding social conflicts that can delay or derail project activities.

Management systems relevant to community impacts describe how an organisation manages risks to project-affected communities. Typically, this is done on the basis of several management plans and documents, because the risks can be complex, diverse and depend on the makeup of the affected communities. Managing risks to affected communities will typically require policies and procedures relating to the following areas (in addition to land acquisition and resettlement – see Section 5.4):

- community health, safety and security
- gender-based violence and harassment
- Indigenous Peoples
- cultural heritage.

**Table 6** sets out practical examples of how clients can incorporate gender considerations into management systems in each of these areas.

#### Table 6. How to incorporate gender considerations into management systems relevant to community impacts

**Community health, safety and security: policies and procedures describing how the organisation manages risks to and impacts on communities**

Overarching management systems on community health, safety and security and emergency preparedness explicitly recognise that:

<sup>11</sup> The CAPSEAH guide is available at: <https://capseah.safeguardingsupporthub.org/>.

- gender-based societal roles and occupational segregation mean women or men in communities may be more exposed to specific hazards
- women and men face different risks or different severity of impacts in relation to pollution owing to biological differences, including with regard to reproductive health.

### GBVH: policies and procedures describing how the organisation manages gender-related risks to communities, including GBVH

Overarching management systems on community health and safety address the following important elements:

- Risk assessments specifically consider project characteristics that are associated with elevated risks of GBVH in project-affected communities. These characteristics include, but are not restricted to, the following:
  - **Labour influx:** an influx of male workers from outside the community – combined with temporary accommodation and remote locations – can lead to heightened risks of GBVH. Labour influx can also place a strain on local services, such as healthcare, which can worsen existing inequalities and limit women’s access to essential services.
  - **Remote or isolated locations:** lack of infrastructure, services and oversight in remote locations can result in limited protection for women and girls, making them more vulnerable to GBVH from workers or outsiders involved in the project.
  - **Increased economic pressures on households:** projects that predominantly employ local men can exacerbate gendered economic burdens. If men’s wages do not make their way back to the household, women must often pick up the slack, by taking on additional work or debt, and may find themselves unable to cope with the increased economic strain. This imbalance can lead to heightened stress, increased vulnerability to exploitation and greater exposure to GBVH, as women may lack the financial independence or social support to escape abusive situations.
  - **Conflict-affected and post-conflict regions:** in regions that have experienced conflict or are in post-conflict recovery, women and girls are particularly vulnerable to GBVH owing to the breakdown of social structures and the lack of functioning legal and justice systems. Conflict often exacerbates GBVH, including sexual violence.
- Policies and processes regarding workforce and contractor management (such as codes of conduct) are in place to prohibit and prevent GBVH. They must also provide details on reporting, investigations and disciplinary measures.
- For high-risk projects, engagement planning include communicating prevention and mitigation measures to project-affected communities and other relevant stakeholders, as appropriate. This might include a statement that GBVH by or against project staff is prohibited, or community consultation to share details of workforce influx and associated management plans.
- Community grievance mechanisms are designed to receive reports of GBVH in a safe and confidential way via effective and accessible channels at project level.
- Policies are in place to swiftly respond to reports of GBVH and ensure survivors are provided with or referred to appropriate medical, psychosocial and legal support. Processes should involve personnel or partners with adequate expertise and resources to respond to cases, prioritising the rights, needs and wishes of people who experience GBVH.



TOOL 7 sets out the key components of gender-sensitive grievance mechanisms for communities.



**Additional guidance:** see EBRD, CDC and IFC (2020) and the *Common Approach to Protection from Sexual Exploitation, Abuse and Harassment (CAPSEAH)* guide.<sup>12</sup>

### Indigenous Peoples: policies and procedures describing how the organisation manages risks to Indigenous Peoples

Overarching management systems that relate to Indigenous Peoples address the following important elements:

- In risk assessments, consideration is given to gendered socio-cultural roles that are distinct to Indigenous Peoples with regard to livelihoods, land use and tenure in risk assessments, in order to anticipate and avoid adverse impacts and inform needs assessments.
- There are separate opportunities for men and women (of different generations) to provide input into community consultation on assessments, decision-making and planning.

<sup>12</sup> The CAPSEAH guide is available at: <https://capseah.safeguardingsupporthub.org/>.

- Management plans (Indigenous Peoples development plans or community development plans) pay particular attention to obstacles to women's input into project design, consultation and decision-making, mitigation measures, as well as compensation and benefits packages.
- Representation of women in any advisory groups, working groups and planning teams is included in the free, prior informed consent process.
- Sustainable development plans and benefits packages consider gender and ensure benefits are accessible and culturally appropriate.

#### Cultural heritage: policies and procedures describing how the organisation manages risks to cultural heritage

Overarching management systems that relate to cultural heritage address the following important elements:

- Consultations on cultural heritage include men and women.
- Consultations on cultural heritage are in a format that is accessible to women and facilitates meaningful consultation with them.
- Consideration is given to how gender norms intertwine with cultural heritage, including who defines cultural heritage, the relationship of women (and men) to particular cultural heritage sites and/or women's specific needs in relation to given sites (which may include economic needs), and to the fact that women often play a central role in preserving intangible cultural heritage, particularly with regard to family life, traditional agriculture and other daily practices in the community.
- Where cultural heritage is used in business activities, community benefit-sharing is promoted to ensure all impacted people can access benefits equally.

#### Community consultation, engagement and grievance mechanisms: policies and procedures describing how the organisation manages engagement with communities

Overarching management systems for communities should address the following important elements:

- Procedures for stakeholder engagement and information disclosure are inclusive and ensure access for women and men. In many settings, this will require separate engagements with men and women.
- There are processes to support confidentiality and safe reporting in grievance mechanisms, including safeguards against retaliation.
- Adequate resources are allocated to grievance mechanisms, so that they can receive and respond to issues that are immediate, severe or at risk of escalation, such as GBVH and resettlement.

#### Case study: Harassment prevention and gender-responsive design in public transport

In Spain, Barcelona's public transport operator, Transports Metropolitans de Barcelona (TMB), received technical assistance from the EIB to strengthen safeguards on the TMB network against all forms of harassment.<sup>13</sup> This support was agreed in the context of a €50 million investment project financed by the EIB for the acquisition of new rolling stock to enhance the accessibility of Barcelona's metropolitan transport system.

The technical assistance project included a special focus on designing data collection and assessment to identify and assess intersectional GBVH risks to women, members of the LGBTQI+ community and other vulnerable groups using the transport network.

Carefully designed, user-centric surveys were conducted to collect data from women and LGBTQI+ users of public transport on their experiences of, perceived security on and preferences regarding transport. These data were analysed and intersectional user profiles (for example, female racial minority migrant caregiver) were created to carry out gender assessments of various locations and scenarios. Findings were used to suggest preventative measures that were gender-responsive and worked for diverse groups. These measures included changes to physical infrastructure (such as additional lighting or design of surveillance systems), as well as planning and operations that incorporate the needs and experience of women and LGBTQI+ people (for example, training, promoting gender diversity in the transport workforce, and inclusive awareness-raising campaigns).

<sup>13</sup> See EIB (2023) and EIB (2025).

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### 5.3. Mitigating gender risks and impacts in the procurement of goods and services

Procurement management systems describe how an organisation purchases goods and services. The exact form will vary between companies, but such systems typically include structures, policies and procedures relating to:

- contractors and intermediaries – provision of labour or services
- supply chains – provision of goods, equipment and materials.

**Table 7** sets out practical examples of how clients can explicitly incorporate gender considerations into management systems across each of these areas.

#### **Table 7. How to incorporate gender considerations into management systems relevant to the procurement of goods and services**

##### **Contractors and intermediaries: policies and procedures describing how the organisation engages and manages third parties that provide labour or services**

Overarching management systems relating to contractors address the following important elements:

- All tendering and contracting documents specify requirements relevant to gender, including discrimination, GBVH and (gender-sensitive) grievance mechanisms.
- Assessment of the capacity of contractors and intermediaries to implement labour standards and OSH requirements explicitly incorporate gender considerations (for example, checking the adequacy of contractors' management systems in relation to gender, addressing the elements outlined in **Table 5** on workplace impacts).

There is a framework for ongoing monitoring and reporting, including clear KPIs.

##### **Supply chains: policies and procedures describing how the organisation purchases goods, equipment and materials**

Overarching supply-chain management systems address the following important elements:

- Supply-chain due diligence and management procedures cover requirements relating to significant OSH risks, including GBVH (for example, incorporating clauses covering these issues into supplier contracts).
- Procedures and policies for ongoing risk assessment and monitoring of suppliers ensure that GBVH is explicitly covered, and that where instances of GBVH are identified, appropriate measures are taken to cause the supplier to adequately prevent and mitigate their impacts.

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### 5.4. Mitigating gender risks and impacts in land acquisition and resettlement

Women, particularly in rural and traditional settings, are often disproportionately impacted by land acquisition and resettlement. Where projects involve land acquisition and involuntary resettlement (as identified, for instance, through an ESIA), it is critical that resettlement planning consider the different needs and preferences of women and men. A resettlement planning document (such as a resettlement action plan or a livelihood restoration plan) describes the data gathering that has been undertaken to assess the type, scope and severity of displacement impacts and sets out how they will be managed, mitigated, compensated and monitored.

Resettlement planning and mitigation should detail procedures, timelines, budgets and resourcing relating to the following topics:

- socioeconomic baselines, census, inventory of affected assets or losses (including cut-off date for establishing eligibility for compensation and resettlement assistance) and valuation of losses
- eligibility for compensation and relocation
- livelihood restoration and improvement planning
- monitoring and evaluation.

**Table 8** sets out practical examples of how clients can explicitly incorporate gender considerations into land acquisition and resettlement management in each of these areas.

**Table 8. How to incorporate gender considerations into management systems relevant to resettlement planning**

**Socioeconomic baselines, census, inventory of affected assets: policies and procedures for data collection and stakeholder engagement**

Assessment of the nature and magnitude of displacement impacts addresses the following important elements:

- A contextual risk assessment is conducted regarding laws (national or customary) or practices that limit women's ownership of land or property, use of land, inheritance or access to credit.
- Household surveys engage both women and men to obtain their views on potential displacement impacts.
- Economic baselines and household surveys gather gender-disaggregated data on livelihoods, income and economic activity, even where this is informal, part-time or non-financial.
- Inventory of affected assets or losses includes loss of access to informal sources of livelihood, income or natural resources, as such losses are more likely to affect women's incomes.
- The cut-off date is to be disclosed in a manner that is accessible to women.



**Additional guidance:** see Section 6 on "Incorporating gender considerations into stakeholder engagement processes".

**Eligibility for compensation and relocation: policies and procedures managing the provision of compensation, resettlement assistance and physical relocation of affected households**

Planning and management of eligibility criteria, compensation and resettlement address the following important elements:

- Plans for information disclosure ensure that information on eligibility criteria and compensation value is accessible to women.
- Decisions on the form of compensation, resettlement locations and resettlement housing design consider gendered risks and incorporate the views of women and men in displaced households and host communities.

Steps are taken to ensure women and men in dual-headed households have equal entitlement to compensation and security of tenure (for example, by issuing joint tenure agreements).

**Livelihood restoration and improvement planning: policies and procedures describing how the organisation will restore livelihoods for economically displaced people**

Livelihood restoration planning and delivery are to address the following important elements:

- Market analysis for livelihood restoration options includes gender-disaggregated analysis.
- Both women and men are consulted on their needs and preferences. Women's views are reflected in livelihood restoration programming (for example, on the need for childcare during skills training). Programming should account for diversity among women.

**Monitoring: policies and procedures describing how the organisation monitors implementation of the resettlement planning and outcomes for affected people**

Resettlement management systems address the following important elements:

- Avenues to raise grievances relating to resettlement and livelihoods are accessible to both women and men, and outreach to women is explicitly considered.
- Monitoring of resettlement outcomes (such as completion audits) gathers gender-disaggregated data and involves consultation with both women and men in households.

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### Case study: Partnering with institutional stakeholders to ensure inclusive engagement and address gendered impacts in resettlement planning

In Tajikistan, the Ministry of Transport collaborated with the regional Committee on Women and Family Affairs to address barriers to women's informed participation during resettlement planning. The committee is the state body that coordinates government efforts to promote gender equality and combat discrimination and violence against women, girls and vulnerable groups.

In relation to a road-building project, a joint team – including local representatives of the committee – conducted household surveys to gather women's views on resettlement impacts and compensation. This collaboration led to more open conversations with households and greater access to women's perspectives, resulting in a more accurate assessment of physical and economic displacement impacts. Following this success, the Committee on Women and Family Affairs was also formally included in an advisory role in the project's resettlement grievance mechanism to address grievances raised by vulnerable women.

## 5.5. Mitigating gender risks and impacts in relation to the environment and climate

Environment and climate management systems describe how an organisation manages issues relating to environmental and climate issues. While the exact form will vary from company to company, such systems typically include structures, policies and procedures relating to the following areas:

- resource efficiency and pollution prevention
- climate change.

**Table 9** sets out practical examples of how clients can incorporate gender considerations into management systems in each of these areas.

### Table 9. How to incorporate gender considerations into management systems relevant to environmental and climate impacts

#### Resource efficiency and pollution prevention: policies and procedures describing how the organisation will take action in relation to resources and pollution

Overarching management systems relating to resource efficiency and pollution prevention address the following important element:

- Initiatives explicitly consider how men and women will be affected, looking at such factors as occupational roles, exposure risks and access to resources.

#### Climate change: policies and procedures describing how the organisation will take action to support low-carbon and climate-resilient development, including by reducing greenhouse gas emissions and building resilience and adaptive capacity

Overarching management systems relating to climate change address the following important elements:

- Climate risk and impact assessments explicitly consider how climate change impacts men and women differently within the organisation's operations and supply chains.
- Policies and procedures that set out climate adaptation, mitigation and resilience initiatives explicitly consider how to ensure equitable access to resources and opportunities for men and women, including in relation to skills development and livelihoods.



**Additional guidance:** see the 2X Global gender and climate toolkit, which includes resources for identifying and responding to gender risks during screening and due diligence.<sup>14</sup>

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<sup>14</sup> The 2X Global gender and climate finance toolkit is available at: <https://www.2xglobal.org/climate-toolkit-home>.

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### Practical tips on mitigating gender risks and impacts through management systems

- Take gender risks and impacts into account when designing management systems, including those relating to the workplace, communities, procurement of goods and services, land and resettlement, environment and climate. The tables in this section provide concise, practical checklists for ensuring that gender is adequately considered in the design and implementation of management systems.
- Stakeholder engagement should constitute a key component of all management systems for effective mitigation of adverse gender impacts.

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## 6. Incorporating gender considerations into stakeholder engagement processes

### 6.1. Why it is important to apply a gender lens in stakeholder consultation

Gender-inclusive stakeholder engagement is central to building strong relationships and ensuring the successful identification of and response to a project's E&S risks. However, it can be highly challenging to ensure that women have opportunities to raise issues of importance to them. Women are often underrepresented in community leadership and decision-making roles, and gender norms mean that they are discouraged from participating in public fora and from offering opinions that may be perceived as critical of men. In some contexts, women also lack experience of engaging in such processes and need support to do so.

By applying a gender lens in stakeholder engagement, clients can identify and address gender-specific risks and opportunities. Women and men are likely to offer different perspectives and raise different concerns during stakeholder engagement, which can help strengthen project outcomes (see the case study from Türkiye by way of example). Where stakeholder engagement is not expressly structured to capture the views of both women and men, understanding of the varying risks to women and men will be limited, which is likely to lead to inadequate safeguards for women and girls throughout the project lifecycle.

Both the EBRD and the EIB treat stakeholder engagement as a cross-cutting requirement and oblige clients to ensure that their stakeholder consultation processes are gender-responsive.<sup>15</sup> The format of the consultation must be culturally appropriate, which means taking gender norms into account. It must be conducted in the relevant local language(s), be understandable to stakeholders, take into consideration stakeholders' decision-making processes and be free from external manipulation, interference, coercion, discrimination, intimidation and retaliation.



**Additional guidance:** see EIB (2020).

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### 6.2. How consultation teams can ensure that gender is taken into account in stakeholder consultation

Stakeholder engagement is meaningful when it involves open, transparent and gender-sensitive engagement between the client, its workers and their representatives, local communities and people affected by the project, and, where appropriate, other project stakeholders. It is most effective when commenced at an early stage of the project and gender is taken into account from the outset, then incorporated into ongoing management systems and monitoring processes. Clients can tailor the nature and frequency of stakeholder engagement to the nature and scale of the project, taking into account the project's complexity, risks and potential negative impacts on individuals (particularly women), communities, other stakeholders, the sector and the country context.

#### **Case study: Gender-disaggregated consultation identifies broad range of community risks and impact mitigants**

In Türkiye, risk assessments for a series of road projects included women-only FGDs and surveys. These engagements identified specific gender risks, as well as broader community concerns that were not raised as often in male FGDs or mixed meetings.

In the women-only FGDs, participants expressed more concerns about road safety risks than male stakeholders. As a result of women's comments, additional mitigation measures were identified as appropriate, such as school zones and modified road safety design. Women's FGDs also identified gender-specific risks relevant to public transport – such as

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<sup>15</sup> See EBRD (2024a), particularly ESR 10, and EIB (2022), particularly Standard 2.

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risks to personal safety after dark – and possible impact mitigants – such as designing the service so that women could be dropped off at the point on the bus route closest to their destination, in addition to designated bus stops.

Practical strategies for ensuring that women’s perspectives and experiences are taken into account in stakeholder engagement include:

- **Ensuring that stakeholder mapping captures the voices of women from diverse groups:** good practice in stakeholder mapping seeks to ensure the participation of a diverse range of stakeholders, including groups of women with different lived experiences, and identify any representative local groups, where they exist. Mapping should also seek to identify potential service providers for gender-specific training and engagement, awareness campaigns and support for grievance mechanisms. As far as possible, stakeholder mapping should aim to ensure that a diverse range of experiences is captured (for example, older and younger women, parents and non-parents, people in different socioeconomic circumstances, migrant workers, people with disabilities), as well as gender.
- **Conducting preliminary research on gender norms:** initial research can help consultation teams understand local gender norms and ensure that stakeholder engagement activities are culturally appropriate and respectful. Without an understanding of gender and roles, stakeholder engagement risks reinforcing existing inequalities, overlooking marginalised voices and failing to capture the full spectrum of risks and opportunities associated with an investment.
- **Engaging with local women’s organisations from the outset:** women’s organisations – including NGOs, community organisations, religious or faith groups – can be an invaluable source of information on gender risks, especially where there is limited information on gender issues available in the public domain to inform desk research. Representatives of women’s organisations may also be better placed to broach sensitive topics – for instance, GBVH or intrahousehold dynamics – that could be difficult for women to discuss openly in public stakeholder forums. They can also inform consultation design to maximise local women’s participation (for example, by advising on appropriate times, venues and formats). Where possible, it is good practice to consult these organisations during the planning process, as they may be able to advise on how to make the consultation culturally appropriate (regarding, for example, subjects of importance to local women, or questions that may cause offence) and help prepare local women for engaging in the consultation process.
- **Offering times and venues for the consultations that are suitable for women, with specific accommodations as necessary:** in most contexts, women are disproportionately responsible for childcare and household duties. Consequently, the likelihood of their participation in consultation activities will be greater if the activities are closer to women’s homes and not scheduled around family mealtimes. It is also useful to identify places where local women regularly congregate (for example, local markets, religious settings, public bathhouses or health facilities) and at which times.
- **Composing a gender-diverse consultation team:** gender-diverse consultation teams are more likely to promote an environment in which women feel comfortable sharing information, and increase the chances of gender-specific concerns being identified and raised, particularly where the teams have planned and researched gender issues in advance. Where possible, women’s interviews and FGDs should be conducted by women, ideally by a local consultant and in the local language.
- **Considering the composition of consultation groups with regard to gender and other characteristics:** if it is determined that mixed consultation groups are likely to minimise, hinder or omit the perspectives of women, consider separate women-only consultation groups or one-on-one interviews with women. Where possible, it may also be appropriate to conduct separate women’s FGDs for different demographic groups (such as by age group or employment status).
- **Keeping gender-disaggregated data on stakeholder consultation:** across consultation events of all kinds, company/project staff should be collecting and recording gender-disaggregated data on invitees and attendees (while preserving confidentiality), in order to analyse and illustrate the diversity of stakeholders consulted.



**Additional guidance:** see also Section 5.4 on “Mitigating gender risks and impacts in land acquisition and resettlement” for more specific considerations on this topic.

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### Practical tips for gender-inclusive stakeholder consultation

- Early and well-informed planning and preparation is key to ensuring successful, gender-inclusive and culturally sensitive stakeholder consultation.
- Conduct preliminary research on gender norms to ensure that consultation is respectful and culturally appropriate.
- Make sure that stakeholder mapping captures relevant women's groups and issues.
- Engage with women's groups from the outset, including local groups, where possible.
- Collect, record and keep gender-disaggregated data on stakeholder-consultation invitees and attendees.
- Ensure that the timing of and venues for consultations are suitable for women, with additional accommodations as needed, and that there is adequate time for discussions.
- Ensure that there is diversity in the consultation team.
- Consider the composition of stakeholder consultation groups with regard to gender and other characteristics (such as age, ethnicity and parental status).

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## 7. Making gender risk management part of ongoing operations

To ensure management systems respond in practice to gender risks and impacts (along with other E&S risks and impacts), it is crucial that the measures for doing so identified during project due diligence are embedded in the project's design and ongoing operations. This includes regard for:

- **resourcing**, to ensure that the right people and budgetary resources are allocated and monitored so that systems remain effective over time
- **training, awareness raising and communication**, to ensure that organisational policies and procedures are communicated to workers, project-affected communities and other stakeholders
- **grievance mechanisms**, to ensure that workers and members of project-affected communities have the opportunity to report breaches of organisational policies and procedures.

### 7.1. Resourcing

Clients are encouraged to assign clear roles and responsibilities for implementing and monitoring the effectiveness of specific policies and procedures relating to gender risks and impacts. Given the potentially wide-ranging nature of gender risks and impacts, a diverse range of individuals from different parts of an organisation often needs to be involved. For instance, for an infrastructural site, the HR manager, E&S specialist, site manager, health and safety manager and community liaison officer could all be involved. Where possible, the roles and responsibilities of different individuals should be outlined in E&S documentation and company policies and procedures, to be reviewed and updated at regular intervals.

Clients are also encouraged to consider the kinds of resources (time and budget) needed for individuals to fulfil their responsibilities. In some instances, additional training and capacity building may be required for individuals taking on new responsibilities. In others, organisations may need to engage third-party expertise – for example, for incorporating gender into due diligence for projects with significant risks or impacts on communities (such as resettlement), complex investigations or remediations related to severe GBVH incidents.

### 7.2. Training, awareness raising and communication

Organisations should have plans in place – with timelines and resources – to communicate key policies and processes relating to gender to relevant internal and external stakeholders, to maintain awareness and provide opportunities for engagement. These communications are not a one-off process and should be undertaken on an ongoing basis. Training, awareness raising and communication plans include consideration of:

- training for workers, supervisors and managers to communicate policies and grievance procedures relating to non-discrimination and GBVH, including induction and ongoing refresher training
- meetings and ongoing engagement with stakeholders (including local community organisations) in project-affected communities
- visual materials displayed in workplaces and communities, including posters with infographics, and contact details in high-traffic areas (accessible to both women and men) where they are likely to be seen.

Through training and ongoing awareness raising, clients are encouraged to keep all workers and project-affected community members informed about reporting channels and grievance procedures for gender-related complaints. This should include explaining how confidentiality and non-reprisal will be ensured and providing clear guidance that the grievance mechanisms should be used to report all types of gender-related concerns, not just concerns of a serious nature.

### 7.3. Designing and implementing gender-sensitive grievance mechanisms for workers and project-affected communities

Good practice with regard to grievance mechanisms takes into account barriers that women may face in raising complaints or reporting issues when they experience negative impacts. For example, women may be underrepresented in workforce management and community decision-making, or gender norms may discourage women from offering opinions that are perceived as critical of men or authority figures. A lack of clarity in the process and/or uncertainty about confidentiality protocols can present significant barriers to women reporting grievances.

Accessible and effective grievance mechanisms are central to risk identification and remediation, and can help identify and respond to new and emerging gender risks. Grievance procedures should be tailored to respond to the operational circumstances of each organisation, and clients should establish separate mechanisms for workers and – where relevant – project-affected communities to respond to the needs of each group. A gender-sensitive approach to the design and implementation of grievance mechanisms helps identify and address issues that affect all workers or the whole community.

Clients are encouraged to ensure that specific measures are in place to deal with grievances requiring special protection measures, such as reports of discrimination or GBVH, including protection from reprisals. The overarching aim is to ensure that complaints relating to gender and GBVH can be received, recorded, investigated and managed appropriately using a survivor-centred approach, in a safe and confidential manner.

The objectives of designing gender-sensitive grievance mechanisms for workers and project-affected communities are summarised in **Table 10**, as are the issues to be taken into account when doing so.

**Table 10. Objectives and considerations when designing gender-sensitive grievance mechanisms**

Objective	Considerations
Stakeholder consultation informs the design and operation of grievance mechanisms	<p>With regard to both workplace and community mechanisms, clients are encouraged to consult with diverse groups of women to identify and resolve any potential barriers these groups face in accessing and using a grievance mechanism. As far as possible, consultation should involve a diverse group, including women of different ages and socioeconomic circumstances, and those with and without care responsibilities. In addition:</p> <ul style="list-style-type: none"> <li>• In the workplace, consultation should include engagement with worker representatives and contracted workers, where they are present.</li> <li>• In communities, consultation should be structured to gather information on and take into account the needs of girls, young women and older women. (The views of those aged under 18 years should be gathered through consultation with parents, guardians and representative organisations, such as schools or youth organisations; children themselves should not be directly involved in stakeholder consultations.)</li> </ul>
Grievance mechanisms are aligned with the national legal framework and relevant internal policies and procedures	<p>Companies need to ensure that grievance mechanisms and related investigation procedures are aligned with national legal frameworks. Note that an organisation's grievance mechanism does not replace other channels as defined by law or collective agreement. Relevant laws will vary by jurisdiction, but may include:</p> <ul style="list-style-type: none"> <li>• laws on employee grievance procedures, employee investigation procedures, disciplinary frameworks and procedural requirements for termination of employment</li> <li>• laws on employer responsibilities for preventing and responding to discrimination and GBVH.</li> </ul> <p>Mechanisms need to be aligned with other organisational policies and procedures relating to gender (such as policies for reporting, disciplinary action, whistleblowing and codes of conduct).</p>
Clear procedures and protocols are documented and communicated to all	<p>Policies, reporting and response procedures, including investigation protocols, responsibilities for managing reports and availability of support services, should be clearly documented and well communicated. Mechanisms should be monitored and reviewed regularly to ensure effectiveness.</p>

Objective	Considerations
	<p>Clients are encouraged to follow clear procedures when a report of gender discrimination or GBVH is made. Responding poorly or inappropriately can undermine the credibility of a company's efforts to address the issue and may cause further harm to those involved. Procedures should outline a structured process for deciding whether to hold a formal investigation, a clear and organised approach to investigations, and an appropriate range of potential follow-up and remedial actions.</p> <p>When developing internal procedures, consideration could also be given to when to engage independent third parties. This is likely to be appropriate in more complex investigations, such as GBVH reports that indicate entrenched systemic issues or are likely to present a conflict of interest for internal investigators (such as in the case of investigations relating to senior management).</p> <p>There should be clear protocols in place for ensuring that grievances are always kept confidential, and that confidentiality is maintained throughout investigations and following the conclusion of the process, regardless of the outcome. At a practical level, this means determining exactly what information should be shared and with whom, based on the principle that information is shared with as few people as possible, on a strictly "need-to-know" basis. Before any information is shared, informed consent should be obtained from the survivor.</p> <p>Grievance mechanisms should also prohibit retaliation and feature a process for identifying retaliation, as women can be particularly at risk in some contexts.</p>
<p>Grievance mechanisms are designed and operated in line with a survivor-centred approach</p>	<p>Grievance mechanisms should be designed so that sensitive gender-related grievances, including those concerning GBVH, can be dealt with in line with a survivor-centred approach. This includes:</p> <ul style="list-style-type: none"> <li>• The rights and wishes of survivors are consistently prioritised and used as the starting point for all decisions, including any immediate steps to protect them from further harm.</li> <li>• Complaints relating to sensitive gender issues are managed by an assigned focal point who is fully trained in how to receive reports and handle them sensitively, safely and in line with confidentiality protocols.</li> <li>• Survivors of GBVH are provided with information about available support services (for example, counselling, medical assistance), which they can take up according to their own needs and wishes.</li> </ul>
<p>There are multiple channels for reporting, including options that offer anonymity</p>	<p>Good practice with regard to grievance mechanisms includes multiple options for filing grievances. Key considerations include providing several different points of contact with whom a grievance can be filed, in case a complainant does not feel comfortable approaching a particular individual. Reporting channels can include dedicated email addresses, WhatsApp numbers, hotlines, online platforms and multiple individuals. Ideally, contact points will include individuals with diverse characteristics and should always include at least one woman. Individuals should also have an option to file a grievance without direct face-to-face contact, for example, through online channels.</p> <p>Complainants should have the option to file reports anonymously if they do not wish to be identified. Where complaints have been raised anonymously, investigations should not seek to establish the identity of the complainant, even if the complaint contains identifying information. Grievance policies should make it clear that all complaints will be taken seriously, but in the case of anonymous complaints, there will be limitations on the client's ability to launch a full formal investigation and/or take disciplinary action against individuals.</p>
<p>Specific consideration is</p>	<p>Where contractor workforces are involved in a project, companies should assess the adequacy of the contractor's grievance mechanism, including from a gender perspective, at the earliest</p>

Objective	Considerations
given to female contract workers	<p>possible stage of the project. Where possible, contracts should include clauses that require contractors to establish policies and procedures to identify and address gender risks.</p> <p>Where a contractor's reporting mechanisms are assessed as not being gender responsive, companies should identify ways of working with contractors to support better incorporation of gender considerations into their grievance mechanisms. If this is not possible, companies should extend their own grievance mechanism to contractor workforces.</p>

All staff who handle gender-related grievances should receive training in how to do so appropriately. This should cover topics including gender-sensitive responses, the survivor-centred approach, psychosocial first aid, confidentiality, data management protocols, protection and support measures, and safeguards against retaliation. If appropriate expertise is available, this training may be carried out in-house; otherwise, external support may be required. Where gender-related investigations are carried out internally, relevant staff members should receive training to ensure they have the skills to conduct such investigations safely and with sensitivity to the needs of complainants (particularly with regard to GBVH incidents).

Where companies lack trained staff to investigate gender-related complaints internally, they may commission third-party experts to conduct these investigations on their behalf. This could include HR firms, legal firms, specialised consultancies or international NGOs with appropriate expertise and experience. Even where staff members are trained to investigate gender-related complaints, third-party expertise may still be required – for example, to respond to particularly complex or sensitive cases, or to reports that implicate senior managers. If complaints relate to individuals below the age of 18, it is important to draw on child protection expertise.

Organisations are encouraged to keep confidential records of all grievances lodged and the outcome of each process. All paper and electronic information should be stored in secure locations and should only be accessible to a limited number of people. If reports are provided to third parties, such as investors, they should not contain any names (of the complainant, witnesses or subject of the complaint) or any potentially identifying information – unless this is specifically requested by the lender, and only with the explicit agreement of the complainant and witnesses.

## 7.4. Monitoring and escalating grievances

Effective grievance management brings many benefits, including in relation to managing gender risks and impacts. Grievances are a very important source of information about issues in the workplace and community, particularly as gender discrimination and GBVH are often underreported, owing to unequal power dynamics. Responding quickly and meaningfully to grievances helps build a culture of openness and communication, where issues are dealt with before they escalate into larger problems. For instance, an employer responding quickly to a report of a single incident of verbal harassment at work can prevent the harm that would be caused to the individual and organisation by that behaviour continuing over a longer period.

In the context of widespread underreporting of GBVH incidents, grievances may also be useful in identifying wider systemic issues that can create more serious risks. For instance, disrespectful language towards women in the workplace may not in itself constitute a serious form of gender discrimination or GBVH, but a number of such complaints may be a warning sign of enabling conditions for more serious forms of GBVH and thus warrant further investigation or review.

Organisations are encouraged to have procedures in place to allow for the escalation of grievances, if the problem raised or the complaint made is especially serious or ongoing. This could be necessary for a serious one-off incident or any recurring complaint that has not been previously resolved informally. Escalation processes provide for these complaints to be progressively elevated to higher levels of authority within an organisation and may be complemented by a robust and independent whistleblowing function. Escalation options can be particularly helpful to protect complainants from retaliation, which is often a risk in the case of gender-related complaints. Knowing that there are clear paths for escalating unresolved complaints can also help foster employee and community trust in the grievance mechanism's fairness and effectiveness.

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### Practical tips for making gender risk management part of ongoing operations

- Ensure clear roles and responsibilities are assigned for implementing and monitoring the effectiveness of specific policies and procedures relating to gender risks and impacts. Document and review these at regular intervals.
- Communicate key policies and processes relating to gender to relevant internal and external stakeholders, including through workforce training (induction and refresher courses), community meetings and events, and visual materials.
- Put in place separate grievance mechanisms for workers and communities to receive reports of discrimination or GBVH, with protection from retaliation for complainants and witnesses.
- Ensure that grievance procedures and protocols are underpinned by a survivor-centred approach, including an emphasis on respect for survivors' wishes, immediate and ongoing safety, confidentiality at all times, and appropriate support for survivors.
- Ensure that mechanisms offer multiple reporting channels, including options to report anonymously.
- Provide options for escalating unresolved gender-related complaints, including the option for whistleblower complaints.

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## 8. Responding to grievances and incidents relating to adverse gender impacts

Organisations need to ensure that they have the right systems in place to respond to adverse gender impacts as these arise in their operations. This includes the ability to respond to serious grievances from workers and project-affected community members.

### 8.1. Ongoing safeguards and identifying relevant referral services

Clients must enforce a clear prohibition on any kind of reprisal against or negative consequences for those who raise grievances. Sanctions and disciplinary measures for violations of this prohibition should be clearly outlined in company policies and widely communicated. All individuals who make gender-related complaints or report incidents of GBVH, along with any witnesses or individuals involved in investigating grievances, should be protected from further harm and from retaliation. It is important to work closely with survivors and witnesses to discuss measures that will protect them from further harm, and to monitor their immediate and ongoing safety over time. In the workplace, safety measures may include reconfiguring teams or shift patterns, so that survivors do not have any contact with the subject of the complaint, or suspending the subject of the complaint while investigations are ongoing.

All individuals who bring forward a GBVH complaint should be provided with information on available support measures. To facilitate this, companies need to maintain a list of local support services that can provide medical, legal and psychosocial support to survivors free of charge and make referrals where necessary. Support offered should include other options appropriate to the circumstances, such as paid leave and alternative work arrangements. At all times, companies should respect the wishes and choices of the survivor with regard to safety and support measures, including if they do not wish to access any form of support service.

To ensure that appropriate support is in place when needed, companies should map and assess available options for third-party support in advance, and may consider developing relationships or agreements with appropriate providers.

### 8.2. Ongoing responsibilities and accountability

Companies are encouraged to review and monitor grievances on a regular basis to identify any patterns in grievance allegations – for example, situations in which or times when certain gender-related incidents tend to occur – which might help identify focus or priority areas to address. Regular monitoring and review can also help inform improvements to specific management plans and the prevention and mitigation measures they contain. It can also be used to check trends over time and to inform whether any adjustments are needed to the way the grievance mechanism operates – for instance, if it is not being used by specific groups. Sources of monitoring data on grievances might include grievance logs, employee surveys and community consultation. Any record-keeping associated with monitoring should be carefully conducted to ensure that confidentiality is preserved at all times.

Note that companies can collaborate with external organisations at a local or national level (such as civil society groups, women's groups and experts) to deliver staff training, respond to sensitive complaints, support survivors, conduct complex investigations and strengthen grievance procedures.

#### Practical tips for responding to grievances and incidents relating to adverse gender impacts

- Ensure that organisational policies outline sanctions for reprisals in relation to gender-related complaints, including GBVH, and that these are implemented consistently.
- Maintain a list of local support services that can provide medical, legal and psychosocial support to survivors of GBVH free of charge and make referrals as necessary. Keep a list of other forms of support that may be helpful, including different kinds of leave.

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- Ensure that all staff who handle gender-related grievances receive training on how to do so appropriately, including with regard to GBVH incidents.
  - Keep confidential records of all grievances lodged and the outcomes of each process, with all information stored securely.
  - Ensure that any reports to third parties, including investors, do not contain any names or identifying details of the parties involved, including the complainant, witnesses and subject of the complaint.
  - Review and monitor grievances over time to identify any patterns or trends.
  - Consider options for collaborating with external organisations to respond to adverse gender impacts – for instance, in relation to staff training, complaint handling or investigations

## 9. Monitoring and reporting

### 9.1. How to monitor gender risks and impacts

Monitoring and reporting systems should be put in place to ensure that management systems are addressing gender risks and impacts effectively over time and that requirements under EBRD and EIB standards are met. Such systems are also the way to track progress against agreed mitigation measures.

The content, scope and frequency of monitoring will depend on the issues identified during project due diligence, project complexity and the underlying project context. Projects where women may face barriers to participation (in the form of limited access to jobs, finance or decision-making, for example) may require more detailed and regular monitoring. As projects evolve, monitoring systems should be updated to reflect new information or changing conditions.



**Projects with higher gender risks and impacts need to undergo additional monitoring.** This might include periodic site visits conducted by project team members or external consultants and/or engaging with third parties, such as civil society organisations. The purposes of additional monitoring are to identify any emerging risks, review gender-related project impacts, and determine whether prevention and mitigation measures have been undertaken and whether any follow-up is required.

To monitor the evolving risk profile of a project, and the effectiveness and adequacy of existing risk management measures, clients are encouraged to develop specific, measurable KPIs that provide useful data on women's and men's participation in project-related activities, access to project-related benefits and exposure to adverse impacts of project activities (see **Table 11**). KPIs can be quantitative and qualitative and should be gender-disaggregated wherever possible.

**Table 11. Indicative KPIs for monitoring gender-related risks and impacts**

Aspect	Indicator(s)
Workforce participation	<ul style="list-style-type: none"> <li>Number/percentage of women and men employed at different levels of seniority</li> <li>Number/percentage of women and men employed in technical occupations</li> <li>Ratio of women to men participating in training, education, career-planning sessions</li> <li>Ratio of the average salary of women to that of men at different levels of seniority</li> <li>Percentage of women on committees (such as HR, health and safety, and legal committees)</li> <li>Number of grievances relating to gender discrimination and GBVH in the workplace (percentage responded to within a reasonable time; percentage under investigation; percentage resolved/closed; percentage satisfied with the resolution)</li> </ul>
Skills development	<ul style="list-style-type: none"> <li>Number of women trained in technical, business or leadership skills through project activities</li> </ul>
Leadership and decision-making	<ul style="list-style-type: none"> <li>Percentage of women in managerial or leadership positions within project teams or implementing agencies</li> </ul>
Workplace safety	<ul style="list-style-type: none"> <li>Number of workplace injuries, disaggregated by gender</li> <li>Number of women employed in technical and health and safety roles</li> <li>Amount of gender-disaggregated incident data</li> <li>Amount of gender-disaggregated training data</li> </ul>
Stakeholder and community engagement	<ul style="list-style-type: none"> <li>Number of women who participated in consultations</li> <li>Number of grievances received from women (non-employment related)</li> <li>Number of women who have accessed the community grievance mechanism</li> <li>Number of community grievances relating to gender discrimination and GBVH in project-affected communities (percentage responded to within a reasonable time; percentage under investigation; percentage resolved/closed; percentage satisfied with the resolution)</li> </ul>

Aspect	Indicator(s)
Economic opportunities	<ul style="list-style-type: none"> <li>• Number of women-led businesses engaged in project procurement or supply chains</li> <li>• Number of women who have benefited from community investment projects</li> </ul>
Community impacts	<ul style="list-style-type: none"> <li>• Number/percentage of women compensated for land impacts and/or taking part in livelihood restoration programmes</li> <li>• Number of women who have accessed the community grievance mechanism</li> <li>• Number of community grievances relating to gender discrimination and GBVH in project-affected communities (percentage responded to within a reasonable time; percentage under investigation; percentage resolved/closed; percentage satisfied with the resolution)</li> </ul>

## 9.2. Wider benefits of effective monitoring

Beyond compliance, the data collected through monitoring play a critical role in strengthening risk management, improving decision-making and enhancing overall project performance. Regular analysis of gender-disaggregated data can help identify emerging trends and persistent challenges, and inform adaptive management strategies that improve the project's ability to meet gender-related and other E&S commitments.

These data can also support mandatory reporting requirements and corporate sustainability reporting, and enhance transparency and accountability. From a business perspective, robust monitoring systems can provide valuable insights for improving management systems, strengthening competitiveness and identifying opportunities for innovation – for example, by demonstrating inclusive hiring practices or highlighting new market opportunities linked to gender-responsive business strategies.

## 9.3. Reporting requirements

Clients should, as part of their E&S reporting practices, report on how they monitor gender risks and mitigate any negative impacts throughout project implementation, including monitoring the project's grievance mechanism. This is in line with both EBRD and EIB requirements that clients periodically report on the implementation of the ESMP and ESAP, and on the fulfilment of any other obligations and/or undertakings incorporated into legal documentation signed with the financing party.

The EBRD and the EIB also require clients to report, in a timely manner, any E&S-related accidents or incidents – including incidents of gender-based or other types of violence and harassment – that have significant adverse effects and to take immediate action to address and prevent any recurrence. This is to enable the EBRD and the EIB to formulate an appropriate response with the client in each case, including seeking specialised technical advice, if needed.

### Practical tips for monitoring and reporting

- Design monitoring systems to consider gender risks as identified during project due diligence, and review and update indicators at regular intervals to respond to evolving gender risks.
- Develop specific, measurable KPIs that provide useful data on women's and men's participation in project-related activities, access to project-related benefits and exposure to adverse impacts of project activities.
- Check that KPIs include both quantitative and qualitative data and are gender-disaggregated wherever possible.
- Report to lenders in line with requirements, including with regard to reporting all GBVH and gender discrimination incidents.

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# Annexes

## Tool 1 – Sources of gender information

### International sources of gender data

#### Gender Social Norms Index (GSNI)

<https://hdr.undp.org/content/2023-gender-social-norms-index-gsni#/indicies/GSNI>

The GSNI measures how social beliefs obstruct gender equality in areas such as politics, work and education, and contains data from 80 countries, covering 85 per cent of the world's population. The analysis reveals that, despite decades of progress on closing the equality gap between men and women, close to 90 per cent of men and women hold some sort of bias against women, highlighting the invisible barriers women face in achieving equality.

#### International Labour Organization labour statistics database

<https://ilostat.ilo.org/data>

The world's leading source of global labour statistics by country and sector, including country profiles, sex-disaggregated employment data and legal databases covering national legislation.

#### SDG Gender Index

<https://equalmeasures2030.org/2024-sdg-gender-index/explore-the-data/>

The SDG Gender Index measures progress towards gender equality in relation to 14 of the 17 Sustainable Development Goals (SDGs) in 139 countries using 56 indicators, including health, gender-based violence, climate change and decent work. The 2024 SDG Gender Index provides a snapshot of where the world stands right now, linked to the vision of gender equality set out in the 2030 Agenda.

#### UN Women

<https://data.unwomen.org/data-portal>

This database provides dashboards of the latest data on gender-specific SDG indicators and data on UN Women's key thematic areas (women, peace and security, and violence against women and girls).

#### UN Population Fund

<https://www.unfpa.org/data>

This portal provides data by country and region and contains dashboards of world population, intimate partner violence, adolescents and youth, among other things.

#### Women, Peace, and Security (WPS) Index

<https://giwps.georgetown.edu/the-index>

Developed by Georgetown University, the WPS Index pulls together data from several indicators, capturing three dimensions of women's lives: inclusion, access to justice and security, including data on violence. Rankings are updated every two years.

#### Women's Empowerment in Agriculture Index (WEAI)

<https://www.ifpri.org/project/weai/>

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This database is the first comprehensive and standardised index to directly measure women's economic empowerment and inclusion in the agricultural sector. Launched in 2012 by the International Food Policy Research Institute (IFPRI), the Oxford Poverty and Human Development Initiative (OPHI) and the United States Agency for International Development's (USAID) Feed the Future initiative, the database is composed of two subindices: one measures women's empowerment in five agricultural domains, the other measures gender parity in empowerment within the household.

#### World Bank Databank

<https://databank.worldbank.org/home>

The World Bank Databank is an analysis and visualisation tool that contains collections of time-series data on a variety of topics. The data on key gender topics are on the themes of demographics, education, health, labour force and political participation, among other things. The World Bank's World Development Indicators, meanwhile, span health, nutrition and population, education and statistical capacity indicators.

#### Women, Business and the Law

<https://wbl.worldbank.org/en/wbl>

Women, Business and the Law is a World Bank Group project collecting data on laws and policy mechanisms to measure the enabling environment for women's economic opportunity. The dataset offers objective and measurable benchmarks for global progress towards gender equality in 190 economies.

#### Sources of context-specific gender data

- National census data – demographic, socioeconomic statistics
- National ministries responsible for implementing government gender equality policies (for example, ministries responsible for labour, social development and health)
- National statistical committee publications with sex-disaggregated data on population, health, education, employment and so on
- Regional studies, project assessments and strategic assessments
- Research studies (such as community well-being or other socioeconomic studies)
- Field studies
- Health impact assessments and/or risk assessments
- Expert, community and public engagement activities (such as workshops, meetings, open houses and surveys)
- Household surveys
- Focus-group discussions (such as women-only groups)
- Key informant interviews
- Civil society organisations and other community groups working with women
- Indigenous knowledge, including oral histories

## Tool 2 – Overarching and sectoral gender risks, questions and mitigation measures

Baseline (cross-sectoral) gender due diligence questions and sample mitigating measures

**Table 12. Overarching assessment and management of E&S risks and impacts**

Risk issues	Key gender due diligence questions	Examples of mitigating measures
<p>A key overarching risk is that the environmental and social assessment process does not take into account differentiated risks and impacts on women and men. The impact assessment process may not take into account the different priorities that men and women place on particular mitigation measures or outcomes.</p>	<ul style="list-style-type: none"> <li>• Is there an understanding of existing gender inequalities in the project location? Identify contextual risks based on the project description and data sources provided in this guidance note (see Tool 1).</li> <li>• Does the information in the project documentation contain sufficient gender-disaggregated socioeconomic baseline data on affected communities in relation to, for example, demographics, life expectancy, health, education, the labour force, employment and/or unemployment, economic activities and livelihoods, and poverty?</li> <li>• Have the differing risks and impacts of the investment on women been identified? How will women and men be impacted differently throughout the project lifecycle?</li> <li>• What monitoring indicators have been incorporated to track over time whether identified gender risks and impacts are being mitigated? What gender-disaggregated data are available?</li> <li>• Are differentiated mitigation measures required to address gender risks and impacts? Is additional technical assistance required to manage gender risks?</li> </ul>	<ul style="list-style-type: none"> <li>• Collect baseline data and information, disaggregated by gender, and using stakeholder engagement and mapping to assess variations in gender and other community-relevant factors (such as ethnicity), including in relation to roles and responsibilities, differences in time allocation, access and control over resources and assets, land usage and land ownership.</li> <li>• Where project-level data are not available, regional or national data may be used (for example, population and census data, labour-force survey data, GBVH survey data, household socioeconomic survey data). Other sources that should be considered include academic research, publications and reports from NGOs, and documentation and data from international organisations and investors.</li> </ul>
<p><b>Stakeholder engagement</b> There is a risk that stakeholder analysis and engagement associated with ESDD will fail to identify/engage with groups of women who are disadvantaged or vulnerable,</p>	<ul style="list-style-type: none"> <li>• Have women’s organisations been consulted?</li> <li>• What measures have been taken to reach out to women who may lack a voice?</li> </ul>	<ul style="list-style-type: none"> <li>• Check if women are adequately represented in teams carrying out stakeholder engagement, particularly where there is direct engagement and focus-group discussions with project-affected women.</li> </ul>

Risk issues	Key gender due diligence questions	Examples of mitigating measures
<p>particularly where these women lack voice and agency within their communities, or with relevant women's organisations.</p> <p>Consultation processes may not be designed in a way that allows women to freely and actively contribute, and/or will fail to capture the full range of women's concerns and priorities about impacts, mitigation mechanisms and benefits.</p>	<ul style="list-style-type: none"> <li>• How do men and women access information? What measures have been put in place to account for this?</li> </ul>	<ul style="list-style-type: none"> <li>• Structure and organise engagement in a way that boosts women's active participation. This might include women-only focus groups run by women and for women, holding meetings with fewer participants, conducting key informant interviews and household surveys in a place and at a time that suits participants. Additional measures might be required to reach particular groups of women (such as using local languages to communicate with women from minority groups).</li> <li>• Disseminate project information through a variety of means – local newspapers, bulletin boards, social media, hosting or participating in public events. Considering literacy levels and use of local languages.</li> </ul>

**Table 13. Assessment and management of E&S risks and impacts relevant to working conditions**

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>Gender discrimination in employment and GBVH can occur at all stages of the employment relationship. Discrimination can be indirect – for example, where policies or rules apply to everyone in the same way in theory, but disadvantage particular groups in practice.</p>	<ul style="list-style-type: none"> <li>• Are there policies and procedures that prohibit non-discrimination and gender-based violence and harassment?</li> <li>• What is the gender distribution of the workforce in general and in management/leadership roles in particular?</li> </ul>	<ul style="list-style-type: none"> <li>• Refer to non-discrimination and GBVH in HR policies – either on a standalone basis or as part of a broader policy. These should be accessible and clearly communicated.</li> <li>• Collecting gender-disaggregated workforce data allows issues to be tracked and monitored over time, and indirect discrimination to be identified.</li> </ul>
<p><b>Recruitment</b></p> <p>Job advertisements or job descriptions may call for applicants of a specific gender, or there may be an unspoken “understanding” that women should not be shortlisted for certain jobs.</p> <p>During recruitment, women may be asked to disclose their pregnancy/family status or be required to undergo pregnancy testing.</p>	<ul style="list-style-type: none"> <li>• Are there defined procedures in place to ensure that men and women are treated equally during recruitment processes?</li> <li>• Are women ever required to undergo pregnancy testing? Why? How is this information used? What happens if the employee refuses to be tested?</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure that job advertisements use gender-neutral job descriptions (except in very limited circumstances where there are legal restrictions on women's employment).</li> <li>• Develop a strategy to boost recruitment of underrepresented groups – for example, through outreach to colleges and training centres, including women on interview and recruitment panels, specifying</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p><b>Wage and working conditions</b></p> <p>Women may not receive equal pay for work of equal value, that is, they may be engaged on less favourable terms and conditions of employment than men for work involving equal levels of effort, skill or level of responsibility.</p> <p>Women may not receive access to training and progression opportunities in the same way as men; for example, they may be seen as unsuitable for management positions owing to (actual or perceived) caring responsibilities.</p> <p>There is a risk that women may not receive all benefits to which they are entitled under law (or collective agreement), such as paid maternity leave, breastfeeding breaks, parental leave or childcare provision.</p>	<ul style="list-style-type: none"> <li>• What is the ratio of men to women employed in defined job groups and at defined seniority levels within the company?</li> <li>• What policies and procedures are in place to ensure equal pay for work of equal value?</li> <li>• Is there a gender pay gap? Why? Are any steps being taken to reduce it?</li> <li>• What is the policy and practice with regard to parental leave, flexible working and caring responsibilities?</li> <li>• What measures are in place to ensure women have equal access to training, skills development and opportunities for promotion?</li> <li>• Are there special arrangements for working women who need to take breaks for breastfeeding?</li> </ul>	<p>in job advertisements that applications from men/women (as applicable) are particularly encouraged.</p> <ul style="list-style-type: none"> <li>• Have a clear prohibition on pregnancy testing.</li> <li>• Collecting gender-disaggregated data relating to wages/seniority allows issues to be tracked and monitored over time.</li> <li>• Developing a clear framework of job descriptions and performance reviews helps ensure that remuneration and promotion are based on objective factors, such as skills, experience and responsibilities.</li> </ul>
<p><b>Collective dismissal</b></p> <p>During a collective dismissal procedure, men may be prioritised for being kept on – for example, because they are seen as family breadwinners or more likely to work full time.</p>	<ul style="list-style-type: none"> <li>• Are gender considerations reflected in collective dismissal plans?</li> <li>• Are there any national legal requirements that protect specific categories of worker (such as pregnant women) from dismissal? How are these requirements being implemented?</li> <li>• What measures are in place to ensure that women or men are not disproportionately affected?</li> </ul>	<ul style="list-style-type: none"> <li>• Collecting gender-disaggregated data on collective dismissals processes can help identify issues, including whether potential selection criteria would disproportionately impact men or women.</li> <li>• Including women in consultation processes associated with collective dismissals can help ensure that issues affecting women are adequately considered.</li> </ul>
<p><b>GBVH/grievance mechanism</b></p> <p>Grievance mechanisms may not take into account the different needs of women and men, including with regard to access and making complaints of a sensitive nature, such as GBVH.</p>	<ul style="list-style-type: none"> <li>• Is the grievance mechanism accessible and open to all, and seen by all as fair and equitable?</li> <li>• Are there multiple contact points? Is a female contact available for all workers?</li> <li>• Are there options for workers to make anonymous complaints?</li> </ul>	<ul style="list-style-type: none"> <li>• Consulting with a diverse group of workers, including women and people of diverse sexual orientation and gender identity, can help resolve potential barriers that these groups face in accessing grievance mechanisms.</li> <li>• Establish separate procedures or a standalone grievance mechanism to manage sensitive complaints, including</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
	<ul style="list-style-type: none"> <li>• What measures have been put in place to ensure confidentiality and to support workers in making complaints of a sensitive nature?</li> <li>• Are there referral options for workers who make GBVH complaints (such as to counselling services)?</li> </ul>	<p>those relating to GBVH, can help encourage use of the mechanism and facilitate safe reporting.</p> <ul style="list-style-type: none"> <li>• Collecting gender-disaggregated data on grievance mechanism usage can help identify issues early.</li> </ul>
<p><b>Worker accommodation</b></p> <p>In some workplaces, the accommodation available for women is inadequate, including in terms of safety, security and other welfare needs.</p>	<ul style="list-style-type: none"> <li>• Does the project provide workforce accommodation?</li> <li>• What measures have been put in place to ensure the safety, security and welfare of workers, and do these measures take gender aspects into consideration?</li> </ul>	<ul style="list-style-type: none"> <li>• Consulting with women workers can help identify additional or specific measures that could be undertaken to improve the safety and security of accommodation or related services.</li> </ul>
<p><b>Contracted workers</b></p> <p>Lack of contracts (informality) may be an issue for women engaged through third parties and this can heighten vulnerability to other labour risks (including in relation to working hours, wages and sexual harassment). There may also be issues regarding the behaviour of (male) contracted workers towards women in the workplace and community.</p>	<ul style="list-style-type: none"> <li>• Are gender-disaggregated data collected on contractors, agency workers, consultants and so on? What is the ratio of men to women employed in defined job groups in third-party workforces?</li> <li>• What measures are in place to check the performance of third parties in relation to women's employment?</li> <li>• Is there a code of conduct for contracted workers?</li> </ul>	<ul style="list-style-type: none"> <li>• Applying a gender lens in assessments and performance monitoring of third parties can help identify and mitigate potential issues.</li> <li>• Working collaboratively with contractors and subcontractors can help mitigate risks, including in relation to gender, particularly where third parties have limited resources and capacity.</li> </ul>
<p><b>Supply chain</b></p> <p>In some supply chains, women and girls will be disproportionately at risk of child and forced labour, as well as GBVH.</p>	<ul style="list-style-type: none"> <li>• How are gender issues taken into consideration in mapping and managing supply-chain risks?</li> </ul>	<ul style="list-style-type: none"> <li>• Include gender-based violence when mapping supply-chain risks as an example of risk of harm.</li> <li>• Apply a gender lens in supply-chain management and monitoring plans; seek professional advice on safeguarding women and girls.</li> <li>• Develop a code of conduct for suppliers that includes support for gender equality can help promote decent working conditions for women and men alike, and guard against discrimination and gender-based violence.</li> </ul>
<p><b>OSH</b></p> <p>Risk assessments, personal protective equipment (PPE) and workplace health and safety protocols may not be gender appropriate and may not consider gender-specific</p>	<ul style="list-style-type: none"> <li>• Do health and safety risk assessments consider gender-specific health impacts, including the provision of adequate PPE to women, and specifically consider risks to pregnant workers?</li> </ul>	<ul style="list-style-type: none"> <li>• Conduct a standalone assessment to evaluate the adequacy of PPE for the female workforce (including sizing and adjustable uniforms to accommodate pregnancy).</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
health impacts, including in relation to pregnancy. Risks may be greater when women are a minority in the workforce.		<ul style="list-style-type: none"> <li>Ensuring women are represented on OSH committees can help facilitate identification of gender-specific risks and the formulation of prevention and protection measures.</li> </ul>

**Table 14. Assessment and management of E&S risks and impacts relevant to community health, safety and security**

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p><b>Labour influx</b></p> <p>GBVH risks are particularly high when it comes to investments involving large-scale infrastructure development and natural resources, where the affected communities are small and remote, and there is a significant influx of predominantly male labourers associated with the project who cannot be readily absorbed into the local community.</p>	<ul style="list-style-type: none"> <li>Is there a labour influx management plan that addresses risks such as GBVH?</li> <li>Is there a policy on GBVH or a code of conduct that addresses GBVH? And has that policy or code been communicated to the workforce?</li> <li>Has any GBVH risk assessment been conducted and have any mitigation measures been developed, including corporate policy, procedures and training?</li> </ul>	<ul style="list-style-type: none"> <li>Structure terms of reference for ESIA consultants to consider specific issues beyond the worksite, including labour influx and GBVH risks.</li> </ul>
<p><b>Communicable diseases</b></p> <p>Risk of exposure to communicable diseases, including sexually transmitted infections, is also heightened where there is significant labour influx. Interactions between the construction workforce and local communities can lead to an increased rate of sexually transmitted infections and other communicable diseases.</p>	<ul style="list-style-type: none"> <li>Are there baseline data on rates of GBVH, transmission rates of communicable diseases, including sexually transmitted infections, sex trafficking, domestic violence, crime rates and so on? If not, what contextual information is available at the project country and project location level?</li> </ul>	<ul style="list-style-type: none"> <li>In the context of labour influx, explore the extent to which influx might be minimised (for example, through local recruitment).</li> <li>Engage with the local health authorities regarding potential measures to reduce transmission of communicable diseases, and with local specialised service providers on delivering training and raising awareness among personnel.</li> </ul>
<p><b>Community grievance mechanism</b></p> <p>Design and implementation of community grievance mechanisms do not take men's and women's access needs fully into account and the mechanisms may not be equipped to deal with issues and complaints relevant to women.</p>	<ul style="list-style-type: none"> <li>Are there established gender segregation and defined roles and responsibilities that may affect women's access to the mechanism?</li> <li>How have the differing access needs of men and women been taken into consideration in design and implementation?</li> <li>Is a female contact point available? Have staff received training on handling sensitive complaints?</li> </ul>	<ul style="list-style-type: none"> <li>Provide training/capacity building to handle gender-sensitive complaints (including of GBVH) from local communities.</li> </ul>

**Table 15. Assessment and management of E&S risks and impacts relevant to land rights**

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>Economic displacement and livelihood disruption can have disproportionate effects on women, particularly where women do not have access to or control over resources, land ownership and finances.</p>	<ul style="list-style-type: none"> <li>• Are land-related gender inequalities known in the country or project area from initial contextual risk analysis?</li> <li>• Are there baseline disaggregated data by sex, gender, age, ethnicity and other community-relevant factors available to facilitate understanding and assessment of any differing impacts on women with regard to livelihoods, land use, access and rights, including customary rights, women’s social networks, access to health and social services, and infrastructure?</li> <li>• What processes are in place to facilitate stakeholder engagement and community grievance mechanisms capturing women’s perspectives?</li> <li>• Has the stakeholder engagement process considered barriers to women’s participation and have the necessary adjustments been made to help overcome those barriers?</li> <li>• Has the stakeholder engagement process considered women’s perspectives and have those perspectives been factored into alternatives analysis to inform how effects may vary for women (in terms of, for example, livelihood, access to health and social services and infrastructure, education)?</li> <li>• Does the company’s stakeholder engagement process consider the participation of women and other underrepresented groups in voicing their concerns and aspirations regarding the resettlement plan?</li> <li>• Has there been an assessment of how women may be disproportionately affected by the resettlement and have appropriate mitigation measures been implemented?</li> </ul>	<ul style="list-style-type: none"> <li>• Check that gender is adequately reflected in information given to the community, consultation processes and community grievance mechanisms, especially with regard to issues of land use, resettlement and compensation.</li> <li>• Consider the impact of changes in land use on women who use informal or untenured land.</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p><b>Compensation</b></p> <p>There is a risk that compensation measures exclude women in contexts where women's ability to own land is restricted by law or custom.</p> <p>Processes that are inaccessible to those with limited technical knowledge, access to information, or literacy may exclude women in certain contexts.</p> <p>Compensation measures may fail to account for disruption to families caused by displacement, particularly female-headed households that rely on informal support networks.</p>	<ul style="list-style-type: none"> <li>• Have women's rights regarding land ownership been assessed?</li> <li>• Are there any practical, legal or cultural barriers that might exclude women from participating equally in compensation schemes?</li> <li>• What actions have been taken to account for this in the design and implementation of compensation schemes?</li> <li>• Does the resettlement plan consider compensation options selected by women? Have female landowners and land users (including informal users) been consulted?</li> <li>• Have the barriers to women's access to finance been assessed and have ways to help overcome them through differentiated mitigation measures been identified?</li> <li>• Has it been ensured that entitlements are transparent and equitable?</li> <li>• How will monitoring be carried out and what indicators will be used?</li> </ul>	<ul style="list-style-type: none"> <li>• Valuation processes should account for communal resources that are often used by women (for example, water sources).</li> <li>• Increase the accessibility of procedures to claim or contest compensation through, for example, awareness raising, supporting those with limited technical knowledge/literacy.</li> <li>• If cash compensation is provided, offer programmes that educate women in financial literacy and management.</li> </ul>
<p><b>Work and livelihoods</b></p> <p>Livelihood restoration programmes do not always take into account barriers faced by women in taking advantage of new income-generating activities connected with the project or taking up skills training opportunities, possibly because of additional burdens created by resettlement.</p> <p>Men derive a disproportionate share of benefits, owing to women's subordinate role or lack of voice. For instance, job-creation initiatives may overwhelmingly benefit men who engage in formal employment, whereas women may be involved in temporary or informal employment that may not be immediately recognised or visible as a "job" (for example, foraging, grazing animals or seasonal agricultural labour).</p>	<ul style="list-style-type: none"> <li>• Are there any practical barriers to women's participation in livelihood restoration programmes?</li> <li>• How has the programme been designed to take into consideration the needs of men and women?</li> <li>• What programmes have been developed to assist women in taking advantage of employment opportunities (for example, training and upskilling, in order for women and underrepresented groups to be able to re-establish their livelihoods)?</li> </ul>	<ul style="list-style-type: none"> <li>• Design livelihood restoration programmes in a way that accounts for the different needs of men and women – for example, differing levels of education/ experience, and of care responsibilities and duties in the home.</li> <li>• Collect gender-disaggregated data relating to participation in livelihood restoration programmes.</li> <li>• Provide training and upskilling for women, so that they can take advantage of employment opportunities.</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p><b>Land</b></p> <p>Men and women may have different roles and responsibilities, access and control, ownership and decision-making powers. Understanding these differences will aid the development of appropriate mitigation measures, including compensation.</p>	<ul style="list-style-type: none"> <li>• Are there any specific laws or practices (relating to inheritance, for example) that negatively impact women's rights to hold land?</li> <li>• How has this influenced the design of mitigation measures, including compensation?</li> </ul>	<ul style="list-style-type: none"> <li>• Support information and awareness programmes on women's entitlement to land and associated processes in advance of any compensation programme.</li> </ul>
<p><b>Grievance mechanism</b></p> <p>There is a risk that women may not have equal access to grievance mechanisms in relation to land and compensation where these are not designed with women's and men's needs in mind.</p>	<ul style="list-style-type: none"> <li>• Is there a need for special or additional measures to ensure that women affected by land acquisition, restrictions on land use and involuntary resettlement have access to project grievance mechanisms?</li> </ul>	<ul style="list-style-type: none"> <li>• Design a project grievance mechanism that provides an accessible grievance line for affected landowners and land users and addresses the vulnerability of women as informal land users.</li> </ul>
<p><b>Stakeholder engagement with regard to land and compensation</b></p> <p>Women and vulnerable groups often do not have equitable access to stakeholder consultations.</p>	<ul style="list-style-type: none"> <li>• Does the stakeholder engagement plan include a variety of methods (such as focus-group discussions, key informant interviews, household surveys) to engage women and other underrepresented groups?</li> </ul>	<ul style="list-style-type: none"> <li>• Check that the project consultation process and impact assessment take into account the needs and interests of all gender groups, and that women and other vulnerable groups are engaged in a meaningful way through specially designed consultation means, detailed in the project stakeholder engagement plan.</li> </ul>

**Table 16. Assessment and management of E&S risks and impacts relevant to the environment**

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>Gendered roles in households and workplaces mean that women may face different patterns of exposure. For example, if women are responsible for water collection/ washing clothes in waterways, they will be more vulnerable to the effects of pollution at these sites.</p> <p>Some investments may lead to significant opportunities for reducing exposure to pollution that arises from gender roles in households – for example, access to grid energy may lead to cleaner cooking and heating technologies that reduce indoor pollution.</p>	<ul style="list-style-type: none"> <li>• Have men and women been consulted on site location and technology used?</li> <li>• Has the development of a pesticide management system, for instance, accounted for the different ways in which men and women are exposed or vulnerable to harm?</li> </ul>	<ul style="list-style-type: none"> <li>• Consulting with women, including on site location and technology used, can help gather women's views for consideration and help identify gendered risks relating to pollution exposure.</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>Some pollutants can result in effects that are specific to women, such as breast/ovarian cancer or fertility issues. Some effects may be specific to pregnant or breastfeeding women.</p>		
<p>Women and men have different roles and responsibilities with regard to the use of natural resources. In rural communities, women's dependence on natural resources for food and fuel may be negatively impacted if there is interference with natural resources and local ecosystems are affected.</p>	<ul style="list-style-type: none"> <li>• Does the E&amp;S documentation consider the use of natural resources and ecosystem services (for example, by local people), who exactly uses them (women, men, boys, girls, elderly men, elderly women) and for what (collecting firewood, herbs, mushrooms, honey, berries or medicinal plants)? Does it consider how those gender groups may be disproportionately affected by a change in their access to or use of natural resources?</li> <li>• Have differentiated measures been provided to prevent particular gender groups and other underrepresented groups from being disproportionately impacted (for example, where women have a differentiated role, as in subsistence production)?</li> </ul>	<ul style="list-style-type: none"> <li>• Carry out a mapping exercise to help depict the areas visually, including routes to accessing resources. Differentiated mitigation measures may be required. For example, are there alternatives to what is being harvested or hunted that are agreeable to those impacted, or are there programmes, training or other assistance that would offer them acceptable alternative opportunities?</li> </ul>
<p>There is also a risk that women's specific knowledge of biodiversity conservation and land management is overlooked during planning and land-use changes.</p>	<ul style="list-style-type: none"> <li>• Does the stakeholder engagement process seek to and confirm whether women's perceptions of the project differ from those of men? Have women been consulted directly?</li> </ul>	<ul style="list-style-type: none"> <li>• Considering in project due diligence how stakeholder engagement will cover men's and women's use of the project area, how their roles and responsibilities differ as they relate to the natural resource, whether there are seasonal variabilities, the size and location of the area, and so on.</li> </ul>

**Table 17. Assessment and management of E&S risks and impacts relevant to Indigenous Peoples' rights**





Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>A major overarching risk is that engagement processes fail to capture Indigenous women's perspectives and concerns, particularly in contexts where there are tensions</p>	<ul style="list-style-type: none"> <li>• What measures are employed to check that consultation with Indigenous Peoples is culturally appropriate, taking into consideration historical and gender power dynamics</li> </ul>	<ul style="list-style-type: none"> <li>• In stakeholder engagement and consultation, include diverse subgroups (for example, women, women elders, young women, women with disabilities and other</li> </ul>





Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>between respect for traditional cultural practice and practices that embody gender equality.</p>	<p>and how to facilitate participation by Indigenous women?</p> <ul style="list-style-type: none"> <li>• Have appropriate measures been developed and implemented based on the stakeholder engagement and consultation process with Indigenous young women, elders, Indigenous women with disabilities, and so on?</li> </ul>	<p>underrepresented groups), in order to be able to assess potential risks and impacts.</p> <ul style="list-style-type: none"> <li>• Indigenous communities are typically more vulnerable than others, and may require a different, culturally sensitive approach with regard to engagement, consultation and information provision. It may be necessary to engage an appropriate expert/specialist to facilitate the consultation process.</li> <li>• The Indigenous Peoples' Development Plan should address issues that may impact young Indigenous women (such as GBVH risks), female indigenous elders (such as access to healthcare and services), and Indigenous women with disabilities (such as access to employment opportunities and services) in different ways.</li> </ul>
<p>Threats to cultural heritage may have specific impacts on Indigenous women; for instance, attempts to protect or preserve cultural practices may exacerbate existing restrictions on women, such as through enforcement of moral standards with regard to conduct and dress. Loss of cultural heritage can specifically impact Indigenous women and lead to diminished status within the community.</p>	<ul style="list-style-type: none"> <li>• How will the stakeholder engagement process involve Indigenous women in order to understand their concerns and aspirations, and identify and assess any differing impacts? What measures may be required to address these impacts?</li> <li>• Has there been an assessment of how Indigenous women use the land for medicine, food, fuel, and at what time of year? Have these areas been mapped?</li> </ul>	<ul style="list-style-type: none"> <li>• Involve indigenous women in decision-making, and support their leadership and skills in heritage-management and economic activities.</li> <li>• Map and safeguard areas used by women for cultural and subsistence purposes.</li> <li>• Link heritage projects to income opportunities for women and ensure fair distribution.</li> </ul>
<p>Where compensation or restoration are provided for loss of tangible cultural heritage, there is a risk that women's concerns are minimised or not fully addressed. This could stem from inadequate consideration of women's relationship to a particular cultural heritage site or their specific cultural/spiritual needs.</p>	<ul style="list-style-type: none"> <li>• Has it been assessed whether the project will restrict access to cultural heritage sites, and how women may experience differing impacts as a result of such restrictions on access to heritage sites and other cultural heritage practices?</li> </ul>	<ul style="list-style-type: none"> <li>• Include consultation with women on the value of cultural heritage in the project consultation and stakeholder engagement processes, and identify mitigation measures based on such consultations.</li> </ul>

## Key gender risks by sector

**Table 18. Key gender risks in the agriculture sector**

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p><b>Community impacts</b></p> <ul style="list-style-type: none"> <li>• Women’s ability to contribute to and benefit from projects may be hindered by asymmetries in the ownership of agricultural resources, access to technical skills and employment formality.</li> <li>• Large-scale agriculture projects can negatively impact small-scale farmers and their access to markets for their products. This can result in business closures, potential loss of local jobs and economic hardship. These impacts may disproportionately affect women both in their roles as informal workers and as heads of household (adverse impacts on households may put added pressure on women as primary care providers and guardians of the domestic sphere).</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• How have gender differences in land ownership and access to agricultural resources been taken into account?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Where external consultants perform assessments, check that gender considerations are incorporated into their terms of reference (paying specific attention to the particular needs of rural women’s communities).</li> </ul>
<p><b>Working conditions</b></p> <ul style="list-style-type: none"> <li>• There are gender-specific OSH risks. For example, exposure to pesticides/fertilisers can impact women’s reproductive health and the well-being of pregnant workers, while heavy lifting is a particular risk for pregnant women.</li> <li>• Women workers are at greater risk of insecure employment where seasonal or short-term contracts are concerned, owing to the prevalence of women in the informal primary agriculture sector.</li> <li>• Large gender gaps in global supply chains contribute to the risk of vertical discrimination, with men highly represented in high-income trading activities, while women are more often engaged in subsistence agriculture.</li> <li>• The risk of discrimination is heightened by the fact that job classifications in the agricultural industry tend to be gendered in such a way that men’s work is designated as skilled and women’s as unskilled. This has an associated impact on the gender pay gap and on the opportunities for skills training.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• What is the composition of the workforce disaggregated by gender, grade and contract type (especially seasonal workers)? Are there occupations or roles where women are particularly (over)represented?</li> <li>• What policies and practices are in place to prevent discrimination and harassment? How are these communicated and implemented in practice, including with regard to seasonal workers?</li> <li>• How are specific tasks requiring tools and equipment performed? In relation to primary</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Review existing management policies and incorporate gender elements (including zero tolerance of GBVH) with further communication to all managers and employees, including casual/seasonal workers.</li> <li>• Where women are underrepresented in supervisor or management roles, encourage measures to address this.</li> <li>• Implement specific training programmes on legal rights and obligations, and on harassment.</li> <li>• Where external consultants perform assessments, check that gender sensitivity and OSH elements are incorporated into terms of</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<ul style="list-style-type: none"> <li>Female agricultural workers are at risk from potentially high levels of violence and harassment by supervisors and colleagues in the fields, plantations and greenhouses of agribusinesses. Verbal and physical abuse may be perpetrated to increase productivity to meet seasonal deadlines. Other features of agricultural work can increase GBVH risks – for example, agricultural sites that extend over large/remote areas, and casual and seasonal employment, which increases asymmetrical power relations.</li> <li>Workplace accommodation at agricultural sites can lack gender-segregated, separate, lockable sanitary facilities, changing facilities or living areas. Isolated access routes may not be always adequately lit, which can result in safety issues. The children who accompany workers may also be at risk.</li> </ul>	<p>agriculture, do women work in isolation in fields or on farms? Are workers housed on site?</p>	<p>reference (paying specific attention to the nature of the workforce). The duration of harvest/picking seasons and the organisation of shifts/contracts need to be taken into consideration during assessment.</p> <ul style="list-style-type: none"> <li>Explore options for increasing women’s voices through representation on OSH committees to identify gender-specific risks.</li> </ul>
Public health, safety and security		
<ul style="list-style-type: none"> <li>Spray drift of pesticides and fertilisers over surrounding communities and/or drinking water pollution may negatively impact women’s reproductive health, in particular.</li> <li>Food safety issues (caused by pesticide residues, for example) have potentially different impacts on men and women, especially if women are the guardians of family health.</li> <li>Where there are high levels of predominantly male seasonal labour, there could be a heightened risk of GBVH and sexually transmitted infections in local communities.</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Have risk assessments incorporated gender considerations (be it specific hazards or whether risk prioritisation is appropriate)? Have these assessments taken into account potential community exposure, including gender-specific risks?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Where external consultants perform assessments, check that gender sensitivity and OSH elements are incorporated into their terms of reference (paying specific attention to chemicals).</li> <li>Where predominantly male seasonal labour presents risks to local communities, consider the scope for training and implementing codes of conduct.</li> </ul>
Land rights		
<ul style="list-style-type: none"> <li>Large-scale acquisitions of farmland can increase the risks of exploitation or abuse of vulnerable landowners or users, particularly for those without formal legal title, in female-headed households.</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<ul style="list-style-type: none"> <li>• Legal and customary restrictions may affect women's land ownership, introducing a risk of non-compliance regarding issues of land use, resettlement and compensation. Women may be more vulnerable in negotiations dealing with the sale and leasing of land, particularly in locations where women lack the legal right to hold title to land and property.</li> <li>• When faced with resettlement and economic displacement, women who are primary caregivers and guardians of their domestic sphere may be constrained in their choices, because others depend on them.</li> </ul>	<ul style="list-style-type: none"> <li>• Will the project involve land acquisition and involuntary displacement? What processes are in place to capture women's voices and facilitate their access to information and grievance mechanisms?</li> </ul>	<ul style="list-style-type: none"> <li>• Check that gender is adequately reflected in information given to the community, in consultation processes and in community grievance mechanisms, especially with regard to issues of land use, resettlement and compensation.</li> <li>• Consider the impact of changes in land use on women using informal or untenured land.</li> <li>• Where external consultants perform assessments, include relevant gender considerations (paying specific attention to the particular needs of rural women's communities).</li> </ul>
Environmental impacts		
<ul style="list-style-type: none"> <li>• Women's knowledge of and expertise in biodiversity conservation, resource management and specialised agricultural practices may not be adequately taken into consideration in sustainability efforts.</li> <li>• Environmental degradation of agricultural land, slow-onset climate-related crises (such as drought) and sudden natural disasters, often exacerbated by climate change, can make relocation or readjustment necessary (see also Land rights, above). Owing to their socially established gendered role, women face more difficulties in making these transitions. Environmental pressures may directly increase GBVH risks, including early marriage, domestic violence, sexual exploitation and trafficking.</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• To what extent has women's knowledge of and expertise in biodiversity conservation, resource management and specialised agricultural practices been taken into consideration in sustainability efforts?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Where external consultants perform assessments, check that gender considerations are incorporated into their terms of reference (paying specific attention to chemicals used and the particular needs of rural women's communities).</li> </ul>
Indigenous Peoples' rights		
<ul style="list-style-type: none"> <li>• Large-scale agricultural projects may negatively impact Indigenous women who rely on resources from the natural environment either to provide a source of income or for direct use in the home.</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• Will the project impact Indigenous Peoples? Have the differing needs of Indigenous men and</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Check that the differing needs of men and women in Indigenous communities in relation to</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
	women in relation to agricultural land been taken into account?	the use of agricultural land are taken into account.
Stakeholder engagement		
<ul style="list-style-type: none"> <li>Men and women have distinct agricultural roles (men are often more active in the production of cash crops and women entrepreneurs may need additional support, training, credit and other resources to shift to cash crops or grow businesses), making it important to proactively engage women, women's organisations (formal and informal) and women farmers separately.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Have women, women's organisations (formal and informal) and women farmers been engaged separately?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Check that gender is adequately reflected in information given to the community, in consultation processes and in community grievance mechanisms, especially with regard to issues of land use, resettlement and compensation.</li> </ul>

Table 19. Key gender risks in water, wastewater and solid waste services

Risk issues	Key gender due diligence questions	Example of mitigating measures
Community impacts		
<ul style="list-style-type: none"> <li>The type of service (for example, the routing of new water and wastewater networks) and the disruptions expected as a result of construction/modernisation works may have differing impacts on men and women.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Has there been an assessment of how men and women will be impacted by the services?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Gender aspects need to be taken into consideration during decision-making on routing and prioritisation of network connections.</li> </ul>
Public health, safety and security		
<ul style="list-style-type: none"> <li>Breaks in the supply of municipal water may have differing impacts on men, women and children. For example, women may be more affected by water cuts later in the morning (as men tend to leave the home</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p>

## Risk issues

- earlier) and during the latter part of the day, when water may be needed for food preparation and cleaning.
- Works in this sector may impact the use of public streets, causing temporary or permanent disruption and thus potentially affecting traffic flow and the safety of pedestrians, especially women, children, the elderly and those with mobility challenges.
- Decisions around the extension of enhanced municipal water services into rural areas disproportionately affect women and girls, who are usually responsible for collecting household water from communal wells at some distance from their home, and who are therefore more vulnerable to diseases spread by poor sanitation.

## Key gender due diligence questions

- Has there been an assessment of who manages waste within the household, and how men and women may be impacted in different ways? (This will influence design and implementation, especially if the project outcome involves behavioural change.)

## Example of mitigating measures

- Where breaks in the supply of municipal water occur, they should take into consideration the timetable of the whole family and the differing impact on men, women and children – including the fact that women are more likely to rely on water for food preparation, cleaning and other household needs.
- Where works in this sector impact the use of public streets, causing temporary or permanent disruption, consideration should be given to traffic flow and the safety of pedestrians.
- Monitoring the impact of work in this sector on households needs to be rigorous and transparent.
- Consider the safety aspects related to design and site location of municipal water, wastewater and solid waste works.

## Land rights

- Men and women who pick waste on landfill sites as a means of earning income may be economically displaced by projects in this sector.
- Works in this sector may involve the acquisition of space habitually occupied by homeless or transient men and women.



In addition to the baseline gender due diligence questions, consider asking:

- Has there been an assessment of potential economic displacement, including relating to waste-pickers?



In addition to the baseline sample mitigating measures, the following may be considered:



- Where waste-picking on landfill sites is a means of earning income for men and women, these workers should be entitled to compensation for economic displacement.
- Where work in this sector involves the acquisition of space habitually occupied by homeless or transient people, consideration should be given to their appropriate resettlement and a gender-sensitive approach adopted where women and men are involved.

Risk issues	Key gender due diligence questions	Example of mitigating measures
Environmental impacts		
<ul style="list-style-type: none"> <li>Women's knowledge of local biodiversity resources and their value to affected communities are not always adequately considered during site selection, potentially leading to further loss of valued resources.</li> <li>Women (who are often employed in agriculture) may be disproportionately affected by knock-on effects on agriculture caused by scarce or unsustainable freshwater resources.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Has consideration been given to men's and women's knowledge of local biodiversity resources?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Women's knowledge of local biodiversity resources and their value to affected communities should be called upon during site selection, so that the loss of valued resources can be minimised or mitigated.</li> </ul>

Table 20. Key gender risks in the energy sector

Risk issues	Key gender due diligence questions	Example of mitigating measures
Community impacts		
<ul style="list-style-type: none"> <li>The type of service (for example, the routing of new water and wastewater networks) and the disruptions expected as a result of construction/modernisation works may have differing impacts on men and women.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Has there been an assessment of how men and women will be impacted by the services?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Gender aspects need to be taken into consideration during decision-making on routing and prioritisation of network connections.</li> </ul>
Public health, safety and security		
<ul style="list-style-type: none"> <li>Breaks in the supply of municipal water may have differing impacts on men, women and children. For example, women may be more affected by water cuts later in the morning (as men tend to leave the home earlier) and during the latter part of the day, when water may be needed for food preparation and cleaning.</li> <li>Works in this sector may impact the use of public streets, causing temporary or permanent disruption and thus potentially affecting traffic flow and the safety of pedestrians, especially women, children, the elderly and those with mobility challenges.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Has there been an assessment of who manages waste within the household, and how men and women may be impacted in different ways? (This will influence design and implementation, especially if the project outcome involves behavioural change.)</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Where breaks in the supply of municipal water occur, they should take into consideration the timetable of the whole family and the differing impact on men, women and children – including the fact that women are more likely to rely on</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<ul style="list-style-type: none"> <li>Decisions around the extension of enhanced municipal water services into rural areas disproportionately affect women and girls, who are usually responsible for collecting household water from communal wells at some distance from their home, and who are therefore more vulnerable to diseases spread by poor sanitation.</li> </ul>		<ul style="list-style-type: none"> <li>water for food preparation, cleaning and other household needs.</li> <li>Where works in this sector impact the use of public streets, causing temporary or permanent disruption, consideration should be given to traffic flow and the safety of pedestrians.</li> <li>Monitoring the impact of work in this sector on households needs to be rigorous and transparent.</li> <li>Consider the safety aspects related to design and site location of municipal water, wastewater and solid waste works.</li> </ul>

Land rights		
<ul style="list-style-type: none"> <li>Men and women who pick waste on landfill sites as a means of earning income may be economically displaced by projects in this sector.</li> <li>Works in this sector may involve the acquisition of space habitually occupied by homeless or transient men and women.</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Has there been an assessment of potential economic displacement, including relating to waste-pickers?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Where waste-picking on landfill sites is a means of earning income for men and women, such workers should be entitled to compensation for economic displacement.</li> <li>Where work in this sector involves the acquisition of space habitually occupied by homeless or transient people, their appropriate resettlement should be considered and a gender-sensitive approach adopted where women and men are involved.</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
Environmental impacts		
<ul style="list-style-type: none"> <li>Women's knowledge of local biodiversity resources and their value to affected communities are not always adequately considered during site selection, potentially leading to further loss of valued resources.</li> <li>Women (who are often employed in agriculture) may be disproportionately affected by knock-on effects on agriculture caused by scarce or unsustainable freshwater resources.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Has consideration been given to men's and women's knowledge of local biodiversity resources?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Women's knowledge of local biodiversity resources and their value to affected communities should be called upon during site selection, so that the loss of valued resources can be minimised or mitigated.</li> </ul>

**Table 21. Key gender risks in the transport sector**





Risk issues	Key gender due diligence questions	Example of mitigating measures
Community impacts		
<ul style="list-style-type: none"> <li>Women and men may be impacted in varying ways by transport projects, owing to differences in their use and choice of transport. Men may have greater access to motorised vehicles, while women more often end up carrying heavy loads while walking along roads without pavements or shoulders. Women face many barriers that limit their mobility and tend to rely more on public transport, take more frequent trips over shorter distances and travel with children.</li> <li>Communities' access to public amenities may be disrupted by temporary closure of roads and footpaths due to construction and all associated issues.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Have men's and women's use and choice of transport been taken into consideration?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>During the appraisal process, consideration should be given to route selections, gender-sensitive road and associated infrastructure (bus stops) design, and transport solutions to ensure they serve the purposes and needs of all members of the community.</li> <li>Bus and tram stops need to be planned with the needs of the public in mind, including, in the case of women, adequate space for children and prams/strollers. Likewise, access to bus and tram stops, whether via ramps or platforms, should accommodate prams/strollers and extra space for luggage/shopping bags.</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
Working conditions	<ul style="list-style-type: none"> <li>• Social norms with regard to appropriate jobs for women limit women's opportunities and typically lead to low levels of women workers in infrastructure (especially in technical jobs), leading to risks in relation to non-suitability of PPE and lack of welfare facilities.</li> </ul> <p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• How many women will be working on site? How will their specific needs be accounted for?</li> </ul>	<ul style="list-style-type: none"> <li>• The impact of the construction project, including temporary closure of roads and footpaths and disruption of access to public amenities, should be considered.</li> </ul> <p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Check that specific consideration is given to the needs of women workers in relation to PPE provision and welfare facilities.</li> </ul>
Public health, safety and security	<ul style="list-style-type: none"> <li>• Women face greater risk of violence and harassment when using public transport, including at bus/tram stops, in train stations and on immediate access routes to train stations.</li> </ul> <p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• To what extent have risks relating to violence and harassment been incorporated into decision-making relating to public transport provision?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Adequate lighting at bus/tram stops, in train stations and on the immediate access routes to train stations is a vital component in helping to provide a safe environment for the public, especially for women. In stations/transport hubs, there should be additional safety features, such as easy access to alarm systems, toll-free phones for emergency use, CCTV or surveillance cameras, while safety information should be prominently displayed.</li> <li>• Where possible, operators should avoid shortening late-night routes and, instead, continue them along side streets and into the heart of residential areas, so that women do not have to walk remaining distances in the dark.</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>Risk issues</p>		<p>Coordinate interchange schedules, particularly late at night, so that passengers do not have to wait long for connections.</p>
Environmental impacts		
<ul style="list-style-type: none"> <li>Women and men may be impacted in different ways by noise, dust and other pollution caused by vehicle emissions. For example, women may be more negatively impacted by high levels of vehicle emissions, speed limits, noise and traffic frequency levels in densely populated areas or near schools.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>To what extent have women's and men's different concerns about pollution been taken into account?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Women's and men's views on the acceptability of pollution impacts should be a factor in route selection and the type of transport system proposed (for example, buses, trams or roads that will facilitate greater car use).</li> </ul>

Table 22. Key gender risks in large infrastructure projects (including non-urban transport)

Risk issues	Key gender due diligence questions	Example of mitigating measures
Community impacts		
<ul style="list-style-type: none"> <li>Women and men may be impacted in varying ways by transport projects, owing to differences in their use and choice of transport. Women face many barriers that limit their mobility and tend to rely more on public transport, take more frequent trips over shorter distances and travel with children.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Have the needs of men and women in relation to transport been taken into consideration?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>During the appraisal process, consideration should be given to the routing selection to reflect the user needs of both men and women.</li> </ul>
Working conditions		
<ul style="list-style-type: none"> <li>Social norms regarding appropriate jobs for women limit women's opportunities and typically lead to low levels of women workers in infrastructure (especially in technical jobs), leading to risks around non-suitability of PPE and lack of welfare facilities.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Will there be women workers on site? If so, does the contractor have policies in place to ensure gender-specific labour and OSH risks are</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Check that terms of reference for ESIA consultants consider specific gender issues; OSH</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
Public health, safety and security	adequately addressed? Are there separate facilities available for women and men?	assessments should examine specific gender-related issues, where appropriate.
<ul style="list-style-type: none"> <li>• Large temporary labour-force influx (especially in small or remote communities) and pressure on existing local community services may create health and security issues, including the risk of GBVH, in the local community.</li> <li>• Public health, safety and security issues may also arise owing to the increased mobility of the population on new roads, as well as increased motor-vehicle and construction-related pollution, along with the consequent gender-specific health issues. For example, dust pollution affecting homes close to transport projects while under construction can have a disproportionate impact on women and children, who are more likely to be at home during the day.</li> <li>• Disruption associated with infrastructure projects causes general stress within the local community, adding to the role women play in managing stress within the family and the community. For example, large civil works may cause temporary or permanent disruption of access to facilities and services, which can result in a disproportionate burden on women as carers.</li> <li>• Women face a greater risk of violence and harassment when using public transport.</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• Will the project involve significant labour influx?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• In the context of labour influx, explore the extent to which the influx might be minimised through the use of local labour.</li> <li>• Check that terms of reference for ESIA consultants consider specific issues beyond the worksite, including labour influx and GBVH risks, if relevant for the project. OSH assessments should examine specific gender-related issues, where appropriate.</li> </ul>
Land rights	<p> In addition to the baseline gender due diligence questions, consider asking:</p>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p>

Risk issues	Key gender due diligence questions	Example of mitigating measures
	<ul style="list-style-type: none"> <li>Will the project involve land acquisition and involuntary displacement? What processes are in place to capture women's voices and to provide women with access to information and grievance mechanisms? Are there any specific laws or practices (relating to inheritance, for example) that negatively impact women's land-holding rights?</li> </ul>	<ul style="list-style-type: none"> <li>Check that terms of reference for ESIA consultants consider specific gender issues; land and resettlement assessments should include a gender dimension, if applicable.</li> <li>Support information and awareness programmes on women's entitlement to land and associated processes in advance of any compensation programme.</li> </ul>
Environmental impacts		
<ul style="list-style-type: none"> <li>Women and men may be impacted in different ways by the pollution caused by vehicle emissions. For example, women may have different concerns about high levels of vehicle emissions and high-speed traffic in densely populated areas or near schools.</li> <li>Women's knowledge of local biodiversity resources and their value to affected communities may not always be adequately considered during route selection, potentially resulting in further loss of valuable resources.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>Have women's and men's concerns in relation to emissions been taken into consideration?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Women's and men's concerns about pollution caused by vehicle emissions should be considered in decisions on route selection.</li> </ul>

**Table 23. Key gender risks in the ICT/digital sector**

Risk issues	Key gender due diligence questions	Example of mitigating measures
Community impacts		
<ul style="list-style-type: none"> <li>Compared with men, women have less access to and are less likely to know how to use digital and mobile services to their full potential.</li> <li>Women are often excluded from digital financial services and products. Unbanked women are less likely than unbanked men to own a mobile phone. Limited access to digital finance (and limited digital financial literacy) can hinder women's financial inclusion and limit the formal ways in which they can save.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>To what extent has women's and men's access to digital and mobile services been taken into account?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Collect data on women's and men's access to digital and mobile services.</li> </ul>





Working conditions		
<ul style="list-style-type: none"> <li>Although platform work can provide flexibility (which can help some women balance work commitments with family responsibilities), many platform workers are classified as self-employed or independent contractors, which can limit their access to social insurance and work protection measures.</li> <li>Algorithmic decision-making in the platform economy can lead to discrimination and bias, affecting platform workers' access to opportunities, services and benefits.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>How are platform workers classified? Is algorithmic decision-making used? What steps are in place to identify and address discrimination and bias?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>It is important to design robust governance and policies to promote transparency in algorithms and decision-making processes, in order to identify and reduce bias and discrimination.</li> </ul>

**Table 24. Key gender risks in the manufacturing sector**

Risk issues	Key gender due diligence questions	Example of mitigating measures
Working conditions		
<ul style="list-style-type: none"> <li>Gender-based discrimination (in relation to recruitment, wages, training and promotion), including on the grounds of pregnancy, is a systemic risk within the sector as a result of such factors as unequal power relations between women and men, gender stereotyping, conscious and unconscious gender bias, gender-related occupational segregation and undervaluing of “women’s work”.</li> <li>Sexual harassment is a key risk where there are more low-skilled female workers supervised by predominantly male managers and supervisors. Incentive structures that allow individual supervisors to assess workers’ productivity and performance can create opportunities for sexual harassment and exploitation, including through the misuse of performance-related pay, bonus schemes and piece-rate systems. Further, tight production targets and deadlines apply strong downward pressure on suppliers, which can increase risks of GBVH. Temporary and agency workers may be less likely to report GBVH for fear of losing their jobs.</li> <li>In certain manufacturing contexts (such as in some sections of the garment supply chain), girls are at greater risk of child labour.</li> <li>Long hours and unpredictable shift work may result in women travelling home in the dark and/or on isolated transport routes.</li> </ul>	<p><b>i</b> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>What is the composition of the workforce (disaggregated by gender, grade and contract type) and the gender pay gap?</li> <li>What policy framework is in place, and how is this communicated to workers, line supervisors and managers? Are issues such as sexual harassment, equal opportunities and discrimination covered?</li> <li>Is there a bonus system? What kind of discretion do supervisors have over the awarding of bonuses?</li> <li>What facilities are available to women?</li> </ul>	<p><b>i</b> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>Ensure that policy frameworks incorporate gender elements (including with regard to equal opportunities and zero tolerance of harassment) and are widely communicated.</li> <li>Implement specific training programmes (for example, on legal rights and obligations, harassment).</li> <li>Where women are underrepresented in supervisor and management roles, encourage measures to address this.</li> <li>Examine whether the workplace organisational structure might be conducive to harassment (for example, whether certain incentive and production target schemes are associated with more sexual harassment) and determine whether practices can be modified.</li> </ul>





- Check that separate facilities are available for women if needed (such as bathrooms and accommodation), depending on the project context.
- Revise grievance mechanisms to incorporate gender sensitivity, including female and male contact points, and confidentiality assurances.

**Table 25. Key gender risks in financial institutions**

Risk issues	Key gender due diligence questions	Example of mitigating measures
<b>Community impacts</b>		
<ul style="list-style-type: none"> <li>• Women tend to operate smaller businesses, rely more on family networks and are often underserved by financial institutions.</li> <li>• Rural women face multiple challenges in accessing finance, both on the demand side (owing to levels of education and financial literacy, gender roles and social norms) and on the supply side (owing to a lack of capacity to design gender-tailored services and products, and to unsuitable delivery mechanisms).</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• What measures are in place to allow men and women to access financial services equally? Are any specific services offered to groups that face challenges in accessing traditional finance (for example, rural women)?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Collect gender-disaggregated information on access to financial services; assess barriers faced by men and women in accessing services.</li> </ul>
<b>Working conditions</b>		
<ul style="list-style-type: none"> <li>• There are key risks associated with discrimination in recruitment, wages, training opportunities and promotion. For example, women in the banking sector may have less upward career mobility than men, partly due to discriminatory attitudes based on stereotypes and social norms.</li> <li>• The sector presents potentially high levels of GBVH risk, including serious risks of sexual harassment (for example, perpetrated by senior staff against junior staff). This may be accompanied by a risk of victimisation for complainants, whereby survivors may be countersued for defamation and possibly receive legal sanctions as a result (including jail sentences or fines).</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• What is the composition of the workforce (disaggregated by gender, grade and contract type)? Is there gender-disaggregated information on income levels?</li> <li>• What policies and practices are in place to prevent discrimination in recruitment, promotion, terms and conditions, and training and development? How are these communicated to workers and implemented in practice?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Check if the HR policy framework incorporates gender elements (including zero tolerance of harassment) and is clearly communicated to the workforce, including all line managers.</li> <li>• Implement specific employee and manager training programmes (for example, on legal obligations, harassment).</li> </ul>

- What grievance mechanisms and measures are in place to prevent and address sexual harassment? Have there been past complaints about gender discrimination or sexual harassment?
- Revise the grievance mechanism to incorporate gender sensitivity, including female and male contact points, and confidentiality assurances.
- Where women are underrepresented in supervisor or management roles, encourage measures to address this.

**Table 26. Key gender risks in the hotels and tourism sector**

Risk issues	Key gender due diligence questions	Example of mitigating measures
Community impacts		
<ul style="list-style-type: none"> <li>• Services required for the expansion of the tourist industry and tourist populations can affect the provision of services (for example, transport, health facilities) for local people, with differing impacts on men and women.</li> <li>• Where tourism projects involve the commercialisation of any cultural heritage, opportunities to share the benefits may not be equally available to men and women.</li> <li>• Prostitution and sex work can sometimes arise as a consequence of tourism, with safety and security implications for women.</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• How is the project likely to affect the provision of local services, including transport and health facilities?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Potential impacts on men's and women's access to local services should be explicitly considered.</li> <li>• If the tourism project involves the commercialisation of any cultural heritage, opportunities to share the benefits should be equally and appropriately available to both men and women.</li> </ul>
Working conditions		
<ul style="list-style-type: none"> <li>• Job segregation is widespread in the tourism sector, with women concentrated in low-skilled, low-paid jobs. Prevailing workplace risks (adequacy and regularity of pay, short-term contracts, excessive working hours and wage arrears) will therefore disproportionately affect women.</li> <li>• Workers in various hospitality positions can be more vulnerable to GBVH (including from customers), for example, front-of-house hotel, bar and nightclub staff; shift workers travelling to or from work during the night, particularly when alone and where transport services may be limited; migrant, temporary and agency workers, who have more precarious employment conditions and may be less likely to report GBVH for fear of losing their jobs; workers with pay structures that rely</li> </ul>	<p> In addition to the baseline gender due diligence questions, consider asking:</p> <ul style="list-style-type: none"> <li>• Are there any specific measures in place to protect workers in hospitality positions from GBVH, including harassment by customers?</li> </ul>	<p> In addition to the baseline sample mitigating measures, the following may be considered:</p> <ul style="list-style-type: none"> <li>• Measures against harassment could include a clear policy that harassment of staff will not be tolerated and an effective grievance mechanism for staff to raise any problems and concerns.</li> <li>• Customer-service training should provide workers with the skills to extend friendly service</li> </ul>

Risk issues	Key gender due diligence questions	Example of mitigating measures
<p>on customers for income, who may be less likely to report harassment; female employees cleaning or servicing hotel rooms, who are at higher risk of sexual harassment owing to the isolated nature of the work and the intimate, personal space of a hotel bedroom; flight attendants or housekeepers, who have roles in which women are often objectified through company advertising, marketing or uniforms.</p> <ul style="list-style-type: none"> <li>• Customer/worker power imbalances where there is a culture of “the customer is always right” can be exploited by customers to harass or abuse hospitality workers. Guests who consume excessive amounts of alcohol can become abusive to staff.</li> </ul>		<p>while maintaining safety boundaries and the ability to defuse uncomfortable situations.</p>

## Tool 3 – List of gender-specific legislative requirements

Understanding relevant legal requirements is crucial when assessing and considering gender-related risks. While national law might impose gender-related compliance obligations on clients, it might also inform the broader social context and give rise to gender-specific risks and considerations beyond a client’s direct control.

### Legislative requirements and compliance-related considerations

**Table 27. Aspects of national legislation relevant to assessing compliance**

Type of legislative requirement	Potential gender-specific legal requirements or provisions
Prohibition on discrimination	<p>Anti-discrimination or labour laws typically prohibit discrimination in employment with reference to defined protected grounds (which may include sex, pregnancy, marital status and parental status) and may refer to defined stages of the employment relationship (for example, recruitment, termination of employment, or wages). Such laws may further specify that “positive action” or “affirmative action” measures do not constitute discrimination.</p> <p>With regard to pay, legislation may require equal pay for work of equal value (in line with the International Labour Organization Equal Remuneration Convention, C100), or other provisions relevant to equal pay (such as equal pay for the same work).</p>
Prohibition on sexual harassment	<p>Legal prohibitions on sexual harassment may be addressed by a distinct sexual harassment law or fall under existing labour, criminal or OSH regimes.</p> <p>Protection is strongest where legislation defines and prohibits sexual harassment in the workplace (compared with a criminal prohibition on sexual harassment, which can be too broadly defined or discourage women from lodging complaints).</p>
Blanket work restrictions on non-pregnant, non-nursing women	<p>Laws governing working conditions, such as rest and hours of work, may contain special provisions relating to women. These are often ostensibly linked to health protection, but not always to maternity protection (see below), and are based instead on ideas of general protection for women. These include:</p> <ul style="list-style-type: none"> <li>• restrictions on night working</li> <li>• restrictions on overtime</li> <li>• prohibitions on specific occupations or tasks for women</li> <li>• prohibitions on working underground.</li> </ul>
Maternity and paternity benefits, parental leave and breastfeeding	<p>Most countries provide for some measure of paid maternity leave before and after childbirth. However, the ability to take such leave may be subject to certain preconditions, such as a defined period of service with a particular employer or provision of medical evidence.</p> <p>Paternity leave is typically of much shorter duration than maternity leave and is not provided for in all jurisdictions.</p> <p>Parental leave is a form of longer leave, often available to either the mother or the father to allow them to care for a young infant, usually following the maternity or paternity period. It is not available in all jurisdictions and may be paid or unpaid.</p> <p>Many jurisdictions provide for daily breastfeeding breaks. Sometimes, women can elect to work shorter days rather than take breastfeeding breaks during the day. Some jurisdictions impose requirements regarding lactation facilities, sometimes linked to the number of women in the workplace.</p>
Health protection for nursing or pregnant women	<p>There may be laws in place, based on maternity protections, that prevent women from undertaking work that is harmful or hazardous to their health or that of their unborn or newborn child. These do not always involve a prohibition, but rather a right for pregnant women to</p>

Type of legislative requirement	Potential gender-specific legal requirements or provisions
	refuse certain kinds of work (such as night work). Some jurisdictions provide for time off for antenatal healthcare checks.
Childcare and flexible working arrangements	In some jurisdictions, employers are required to provide creches or childcare services, often linked to the number of women workers (which can create a disincentive to hire more than a certain number of women.) In some countries, employers may be required to accept or consider flexible working arrangements for employees.
Collective dismissal	In some countries, legislation sets out selection criteria in relation to categories of worker who should either be prioritised for retaining their employment (for example, family breadwinners) or dismissed first (for example, part-time workers, workers with the shortest tenure). In some cases, pregnant women or working parents may be expressly protected by law.
Retirement	In many jurisdictions, the age of retirement is lower for women than men.
Quotas for women on boards	In some countries, quotas have been introduced to promote greater participation by women in corporate governance.

## Legislative requirements and links to broader contextual risks

**Table 28** focuses on the ways in which laws might impact broader social dynamics, giving rise to gender-related risks. Given the complex nature of these issues, responses may go beyond compliance to promote positive gender outcomes.

**Table 28. How laws might give rise to gender-related risks**

Type of legislative requirement	Potential gender-specific legal requirements or provisions	Examples of good practice where legal frameworks are weak
Property ownership	Legal frameworks may restrict women's ownership or inheritance of land, particularly in countries where customary systems of land governance are recognised. In rural areas, customary law and traditional forms of justice are often particularly important.  Family laws (especially those relating to marriage and divorce) and inheritance laws can play an important role in determining the extent to which women own land or have control over assets.	In the context of land acquisition or resettlement, compensation processes and frameworks take into account the difference in access by women and men to formal land ownership and how this might be affected by legal frameworks, including customary law.
Financial inclusion	In some cases, legal frameworks may influence women's ability to conduct business or interact with financial institutions in the same way as men. In many countries, there is no explicit statutory prohibition on discrimination in access to credit. <sup>16</sup>	Compensation frameworks take into account any legal restrictions that may make it difficult for women to benefit from job creation initiatives (such as grants for small and medium-sized enterprises) or receive compensation payments.

<sup>16</sup> See the World Bank Group's Women, Business and the Law dataset: <https://wbl.worldbank.org/en/wbl>.

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## Tool 4 – Gender considerations for site visits

### Overarching considerations — safeguarding and confidentiality

Prior to any site visit, it is important to conduct a risk assessment of potential safeguarding issues that might arise during the visit. It is possible that the team may observe serious non-compliance on site (such as dangerous accommodation facilities) or have reason to believe that a worker is at risk of immediate or ongoing harm (they are in a situation where they are facing physical or sexual abuse, for example). Tailored safeguarding protocols should be developed for all site visits, and all team members should receive training on how to implement these. Safeguarding protocols include the following elements:

- **Do no harm:** under no circumstances should anyone conducting a site visit attempt to address a situation immediately, as this may lead to the affected individual being placed at greater risk of harm. Anyone carrying out direct interviews with workers should be guided by a survivor-centred approach, that is, they should prioritise the rights, needs and wishes of the survivor. Information on relevant support services should be offered to all participants.
- **Informed consent:** explicit written or verbal consent should be obtained from all individuals participating in interviews or focus-group discussions. Individuals should be provided with the opportunity to ask questions before giving their consent, to leave if they are not comfortable participating in the interview and to refrain from answering any specific questions. This should be clearly communicated.
- **Informed consent – sensitive topics:** interview participants should be made aware that sensitive topics may arise in the interviews/FGDs, but that the interviewer is not requesting that participants disclose personal information about themselves. Where applicable, it should be stressed that workers are not being asked to share information about GBVH incidents; rather, the purpose of the interviews is to understand how safe women (and men) feel at work or in the community, and how well the company's systems are working. Participants should be encouraged to share only what they feel comfortable discussing.
- **Keeping track of potential incidents:** potential safeguarding incidents should be noted, with as much detail as possible. If the issue has been raised directly with the team by a worker, ensure that the individual at risk has contact details for the team and that the team has theirs.
- **Escalation of concerns:** in situations where an individual worker is thought to be at risk (such as where there is evidence of GBVH), this should be noted in detail and reported back to the lender for consideration as quickly as possible. It is not desirable or necessary to report concerns immediately to the employer, as it may place the affected individual at greater risk of harm. Escalation protocols should be agreed prior to the site visit taking place.
- **Confidentiality:** maintain the confidentiality of all comments made by individual workers. Any kind of information that might reveal the identity of a worker who raised concerns should not be shared with management or any company representatives. Managers or supervisors must not be present during any worker interviews or FGDs.
- **Women-only consultation:** convene women-only interviews and FGDs, especially in the context of reported or potential GBVH and other gender risks. It is important that FGDs relating to GBVH issues are single sex and conducted by a member of that sex; in other words, women should be interviewed by women only.
- **Time and location:** interviews with workers should take place during (paid) working hours. The scheduling and location of interviews with community members should take into consideration household and caring responsibilities.

### Document review

The overall purpose of a document review is to enable an initial analysis of gaps between company policies and procedures, on the one hand, and national law and international good practice, on the other, and to identify priority areas to follow up. It is important to request relevant documentation in advance, so that it can be shared ahead of the site visit or made available during the visit itself. In addition, robust procedures must be in place relating to data protection and privacy, particularly for sensitive information (for example, grievance logs, salary information).

**Table 29. Checklist of key gender considerations for document reviews**

Aspect	Gender considerations
HR policies, procedures and documentation	<p>Document review includes the following:</p> <ul style="list-style-type: none"> <li>• company policies relating to equal opportunity, maternity/paternity leave, childcare, flexible working and related HR policies (including the company handbook, regulations or collective agreement)</li> <li>• company policies or codes of conduct relating to gender-based violence and harassment/inappropriate behaviour and information regarding related procedures</li> <li>• details of any training for employees or managers in how to identify and address bullying, sexual harassment, discrimination and/or unconscious bias</li> <li>• details of existing internal programmes/initiatives relevant to women’s employment or of relevant partnerships (for example, with education providers)</li> <li>• examples of standard employment contracts (setting out a standard set of conditions and entitlements) for a selection of occupations</li> <li>• policies and procedures relating to promotion and training</li> <li>• policies and procedures relating to recruitment, including sample job advertisements</li> <li>• results of employee engagement surveys (if any)</li> <li>• any self-assessment or third-party assessment or certification relating to gender equality.</li> </ul>
Grievance mechanism(s)	<p>Document review includes the following:</p> <ul style="list-style-type: none"> <li>• company policies and procedures describing worker and community grievance mechanisms, including any separate procedures relating to GBVH</li> <li>• grievance logs</li> <li>• documentation of management responses and investigation reports.</li> </ul>
Community	<p>Document review includes the following:</p> <ul style="list-style-type: none"> <li>• company policies or codes of conduct relating to GBVH/inappropriate behaviour and information regarding related procedures.</li> </ul>

## Data collection

The overall purpose of collecting data is to enable a comparison of men’s and women’s employment at the company, and to enable early identification of risk issues. As a general rule, any data relating to workers should be gender-disaggregated, and data points should be requested for the previous three years to enable identification of trends over time. It is important to request data in advance and to allow sufficient time for these to be collected and compiled.

**Table 30. Checklist of key gender considerations for data collection**

Aspect	Gender considerations
Representation of women and men	<ul style="list-style-type: none"> <li>• Total number of women and men employed</li> <li>• Number and percentage of women and men employed at different job levels and in different occupational categories</li> <li>• Number and percentage of men and women in temporary positions</li> <li>• Number and percentage of men and women in leadership positions and at board level</li> <li>• Age distribution of workers (gender disaggregated)</li> <li>• Absenteeism (gender disaggregated)</li> </ul>
Career trajectories	<ul style="list-style-type: none"> <li>• Length of tenure at the company (gender disaggregated)</li> <li>• Number of promotions at each level and in each department (gender disaggregated)</li> <li>• Number of women and men participating in training activities</li> <li>• Voluntary workforce turnover (number of employees who left the company (gender disaggregated))</li> <li>• Reasons for leaving the company (if recorded)</li> </ul>

Aspect	Gender considerations
Wages	<ul style="list-style-type: none"> <li>• Salary distribution by level and department (gender disaggregated)</li> <li>• Average salary of women employees (total, plus disaggregated by job level and occupational category)</li> <li>• Average salary of men employees (total, plus disaggregated by job level and occupational category)</li> </ul>
Recruitment	<ul style="list-style-type: none"> <li>• Number of women and men participating in employment outreach events (job fairs and so on)</li> <li>• Number of candidates who apply for vacancies at each level and in each department (gender disaggregated)</li> <li>• Number of candidates who are hired for vacancies at each level and in each department (gender disaggregated)</li> </ul>
Parental leave	<ul style="list-style-type: none"> <li>• Number of women who have taken maternity leave (annually)</li> <li>• Number of women who have returned from maternity leave (annually)</li> <li>• Number of men who have taken paternity leave (annually)</li> <li>• Number of men who have returned from paternity leave (annually)</li> <li>• Number and percentage of men and women who have taken other forms of parental leave (annually)</li> <li>• Number and percentage of men and women who have used other types of parental support (such as childcare programmes)</li> </ul>
Flexible working	<ul style="list-style-type: none"> <li>• Number and percentage of employees in part-time employment (gender disaggregated)</li> <li>• Number and percentage of employees with flexible working arrangements (gender disaggregated)</li> <li>• Number and percentage of employees working from home (gender disaggregated)</li> </ul>

## Interviews and focus-group discussions

Interviews and focus-group discussions allow more in-depth information on specific risk issues to be gathered from workers and their organisations, and from management and HR, which can be a particularly good source of information on management systems relating to gender.

**Table 31. Checklist of key gender considerations for interviews and FGDs**

Aspect	Gender considerations
HR	<ul style="list-style-type: none"> <li>• Hold separate meeting(s) with the HR department to discuss HR policies and procedures relevant to gender, and mechanisms for their implementation (including those listed under document review), and follow up any queries relating to information and document requests. It may be necessary to have multiple meetings with the HR department over the course of the visit.</li> </ul>
Management	<ul style="list-style-type: none"> <li>• Understand management's perspectives on key gender challenges and concerns, and their priorities.</li> <li>• Overview of policies and people management practices relevant to gender.</li> </ul>
Worker interviews and focus-group discussions	<ul style="list-style-type: none"> <li>• Aim to better understand workers' perspectives and their day-to-day experiences, including in relation to specific challenges faced by workers (including the different experiences of women and men), and the adequacy of worker policies and mechanisms (in terms of, for example, workers' awareness of non-discrimination policies and their usage of the grievance mechanism).</li> <li>• Worker engagement could include vulnerable women workers (identified as part of a document review or data collection exercise, for example). These might include women in low-wage temporary work, self-employed or contracted female workers, young workers, migrant workers, sales agents, etc.</li> <li>• Aim to verify any issues raised during the worker interviews through other parts of the assessment, such as worker grievance logs.</li> </ul>

Aspect	Gender considerations
Local community stakeholders	<ul style="list-style-type: none"> <li>• Identify relevant local community organisations and/or women's rights organisations and women's groups through the preliminary desktop review and preparation.</li> <li>• To the extent possible, focus interviews and FGDs on gender risks related to the project, including workforce risks and interaction between the company's workers and operations and community members. Engagement should also cover the adequacy of the company's community grievance mechanisms and outreach.</li> </ul>

## Site walk-through

Visual inspection of onsite facilities during site walk-throughs should be tailored to the operational context. For example, the checklist below may include reference to production areas, warehouses, construction sites, worker accommodation, changing rooms, sanitary facilities and other facilities, as appropriate.

**Table 32. Checklist of key gender considerations for the site walk-through**

Aspect	Gender considerations
Location, grounds and access routes	<ul style="list-style-type: none"> <li>• Buildings and grounds in locations perceived as safe by the local community</li> <li>• Well-maintained lighting in and around ground and access routes</li> <li>• Security equipment (such as CCTV cameras)</li> <li>• Personal alarms for workers in isolated locations or situations</li> </ul>
Water, sanitation and hygiene (WASH) facilities	<ul style="list-style-type: none"> <li>• Separate, lockable latrines</li> <li>• WASH facilities conveniently located and easily accessible</li> <li>• Well-lit WASH facilities</li> <li>• Provision of hygienic and safe sanitary disposal facilities</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Safe transport provided to and from the worksite</li> <li>• Safe walking routes to and from safe waiting areas at transport facilities (including public transport stops)</li> </ul>
Worker accommodation	<ul style="list-style-type: none"> <li>• Living facilities located within reasonable distance of worksites</li> <li>• Separate sleeping areas for men and women (except in family accommodation), with lockable doors and windows</li> <li>• Separate beds for each worker</li> <li>• Separate, lockable sanitary facilities located within the same building</li> <li>• Adequate and well-maintained lighting around worker accommodation</li> <li>• Measures in place to avoid overcrowding and lack of privacy</li> </ul>
Social aspects	<ul style="list-style-type: none"> <li>• Social spaces that are safe and welcoming places for all workers to use</li> <li>• Leisure areas designed for both men and women</li> </ul>

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# Tool 5 – Gender-related requirements for environmental and social due diligence terms of reference

## How to use this tool

This tool provides a series of elements that may be inserted or incorporated into terms of reference for general ESDD. These elements should be tailored to the nature of the project and any associated gender risks. The tool is not intended to act as a standalone set of terms of reference.

## Scope of work

The scope of work should explicitly call out gender considerations. Tasks may include, but not be limited to, the following:

- scoping and assessment of key gender-related risks associated with the project, taking into account the workforce (including contracted workers and supply-chain workers), communities, service users and project beneficiaries
- a review of existing documentation on gender/GBVH, including HR policies, procedures and documentation, grievance procedures and grievance logs (including anonymised data on GBVH incidents)
- a media search to review key contextual information on gender/GBVH relevant to the client and any key contractor, sector and country/region, plus any specific gender issues that have already been identified as high-risk in a preliminary review
- a review of local legislation relevant to gender/GBVH (see Tool 3), and an assessment of gender risk management and practices against national labour law, international labour standards and relevant lenders' standards
- a review of human resources management capacity and competency with regard to gender issues in relevant parts of the organisation that have already been identified as high-risk in terms of gender considerations/GBVH (for example, head office, selected country offices, selected operational units, subsidiaries, contractors, specified supply chains)
- interviews and FGDs with vulnerable workers, identified in the preliminary desktop review and preparatory work (for example, women in lower-wage jobs, self-employed or contracted female workers, young women, migrant workers and sales agents)
- where there are GBVH risks related to community members, interviews with relevant community organisations and women's groups, to be identified through the preliminary desktop review and preparatory work
- an assessment of the policies and procedures in place to identify, manage and monitor gender-related/GBVH risks in line with national labour law and international good practices (and identifying where any additional policies or processes are needed)
- the development of an action plan, in collaboration with the client and lender(s), that identifies measures needed to bring the client's management of gender/GBVH risks into line with relevant lenders' standards, and the timeframe for each measure.

## Deliverables

The following considerations should be included when outlining key deliverables in the terms of reference:

- report and action plan – examples of gender-relevant elements to be covered in the final report may include, but are not limited to:
  - a description of the gender workplace assessment and methodology (including protocols for interviews/FGDs)

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- the results of the gender risk assessment, including recommendations to address any findings, with special attention paid to gender/GBVH
  - the results of legal gap analysis and benchmarking with regard to gender
  - the results of a media search with special attention paid to gender
  - gender-disaggregated workforce and community data
  - the findings regarding gender/GBVH management capacity and systems, and resulting safeguarding risks
  - an overview of usage and outcomes of grievance mechanisms and the GBVH reporting framework
  - a gender action plan, with timebound recommendations (including associated costs and resourcing needs) for the client to strengthen its gender/GBVH management systems, and an indication of relative priorities.

## Project team and qualifications

The nature and depth of the gender expertise required in the team will vary according to the sector, geography and types of gender risks. The rules and requirements for participation in the request for proposals should set out expectations with regard to gender/GBVH expertise. Criteria used (and outlined in the terms of reference) to assess the proposals received should include the ability to demonstrate:

- prior experience in carrying out ESDD that incorporates consideration of gender risks
- specific experience of projects similar to the one that is the subject of this request for proposals
- specific experience in the country concerned
- sound understanding of national legislation, lenders' requirements and International Labour Organization conventions relevant to gender/GBVH
- demonstrable understanding of women's rights and gender equality issues
- demonstrable understanding of lenders' safeguarding requirements and their practical application
- a diverse worker interview team in terms of gender composition
- understanding of and experience in dealing with safeguarding issues that may arise, including GBVH
- as appropriate, any specific thematic expertise (such as sectoral)
- as appropriate, capacity to conduct worker interviews and FGDs in local language(s).

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## Tool 6 – Gender action plan template

Due diligence processes may identify the need for specific management plans and corrective actions. For projects that present significant gender risks, a gender action plan may be developed or incorporated into an ESAP. This tool provides an action plan template and key principles to consider when developing gender action plans.

### Key principles

Gender action plans should:

- be tailored to the specific risks identified during due diligence and proportionate to the scale of the risks
- be based on a needs assessment and consultations conducted in preparing the action plan
- identify the roles, responsibilities and resources related to implementation and, where possible, name the individuals concerned
- set out clear timelines for actions and monitoring
- outline actions and indicators that support monitoring, reporting and a progress review; indicators should be specific, measurable, achievable, relevant and timebound (SMART)
- include cross-references and alignment with stakeholder engagement plans and ongoing consultation planning
- be fully owned and understood by the client (this is particularly important in the case of plans that may have been drafted by a third party).

### Action plan table template

The following table template includes sample text for relevant project phases and areas of activity. This tool, if used, must be edited and tailored to the specifics of the project and company in question, and take into account the findings of project due diligence, including feedback from stakeholder consultation. See also Tool 2, which sets out further examples of actions to mitigate gender risks.

Theme/Phase	Action	Relevant indicators	Target outcome	Ownership and responsibilities	Resourcing	Priority	Timeline (month and year)	Comments
Recruitment for construction phase	Equal opportunities policy will be developed and shared with managers responsible for local content hiring	<ul style="list-style-type: none"> <li>• Date of equal opportunities policy publication</li> <li>• Hiring managers are sent the policy and acknowledge receipt and understanding</li> <li>• Policy is attached to job advertisement</li> <li>• Number of local women hired in construction phase</li> </ul>	<ul style="list-style-type: none"> <li>• More women workers included in local content hiring</li> <li>• Women hired report positive experience during hiring process</li> </ul>	<ul style="list-style-type: none"> <li>• HR team (policy development)</li> <li>• Hiring managers</li> <li>• Stakeholder engagement team</li> </ul>	Staff time	Medium	By [insert date]	<p>Note hiring and construction schedule</p> <p>See stakeholder engagement plan</p>
Grievance management	Training/capacity building to handle gender-sensitive complaints (including of GBVH) from local communities	<ul style="list-style-type: none"> <li>• Number of training sessions conducted for staff</li> <li>• Number of attendees</li> <li>• Percentage of grievance management team trained</li> </ul>	<ul style="list-style-type: none"> <li>• 100 per cent of staff handling grievances via hotline are trained</li> <li>• 100 per cent of local community liaison staff are trained</li> <li>• Complaints from community members regarding GBVH are handled appropriately and in a timely manner</li> </ul>	<ul style="list-style-type: none"> <li>• HR team</li> <li>• Community liaison manager</li> </ul>	<ul style="list-style-type: none"> <li>• Staff time</li> <li>• Budget to engage external expert trainers</li> </ul>	High	By [insert date]	See process document and training log for collecting attendance data

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## Tool 7 – Key components of gender-sensitive grievance mechanisms in the workplace and for communities

This tool provides sample policy provisions that can be used when developing gender-sensitive grievance mechanisms. The first component focuses on provisions for workplace grievance mechanisms and the second on community grievance mechanisms.

### Key components and sample policy provisions – workplace

Whether a company chooses to adapt existing grievance mechanisms or introduce a standalone mechanism to manage such complaints, the key components and sample policy provisions outlined below are applicable in both cases:

Reporting channels	
Key component	Sample text
Commitment to providing a safe and inclusive avenue for addressing sensitive grievances	"The company actively encourages and supports the reporting of all incidents of discrimination and gender-based violence and harassment in its operations."
Multiple, easily accessible reporting channels	"Grievances may be reported to [ <i>outline reporting channels, providing the contact details of staff members responsible for receiving grievances; include at least one channel that does not necessitate face-to-face contact</i> ]."
Provision of anonymous channels	"Workers who wish to submit complaints anonymously may do so through [ <i>state anonymous reporting channel</i> ]."  "The company will address all anonymous reports; however, anonymity may limit the company's ability to initiate a formal investigation and/or enforce disciplinary measures against alleged perpetrators."
Confidentiality	
Commitment to confidentiality	"The company is committed to maintaining confidentiality when handling grievances raised under this procedure."
Description of measures to protect confidentiality	"Information concerning reports of discrimination and gender-based violence and harassment will be disseminated on a need-to-know basis only, to as few individuals as possible and subject to the consent of the complainant."  "All paper and electronic information is stored in secure locations subject to strict data management protocols."
Link failure to maintain confidentiality to disciplinary consequences	"Violations of confidentiality requirements will result in disciplinary action."
Response to reports	
Commitment to a survivor-centred approach	"When addressing and investigating reports of discrimination and gender-based violence and harassment, the company will honour the preferences of survivors, including whether they wish to involve the authorities, whether they wish for disciplinary action to be taken against the alleged perpetrator and the subsequent steps they would like to be taken."

Clear gender-responsive investigation procedures	<p>“The company is committed to ensuring that investigations relating to discrimination and gender-based violence and harassment are conducted promptly, impartially and by individuals with expertise in handling sensitive matters.”</p> <p>“The company is committed to a transparent process for workers to express their concerns and file grievances, including anonymous complaints. Management will treat grievances seriously and take prompt and appropriate action. Grievances will be handled in accordance with company protocols for investigation: <i>[outline company procedures and the responsibilities of specific staff]</i>.”</p>
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Additional training for staff involved in the management of sensitive grievances	<p>“The company provides additional training for all staff responsible for receiving and managing grievances relating to discrimination and gender-based violence and harassment: <i>[outline additional training provided and examples of staff trained, such as HR or site management staff]</i>.”</p>
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### Support and safety measures

Clear prohibition of retaliation	<p>“The company is committed to ensuring that all workers feel secure and protected from any form of retaliation or discrimination for reporting concerns. Retaliation or discrimination against individuals who report grievances or participate in investigations is strictly prohibited and will result in disciplinary action.” <i>[Include examples of retaliatory behaviours relevant to the workforce, such as docking pay, workplace bullying or bias in promotion.]</i></p>
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Safety measures for individuals involved in the grievance process	<p>“The company will put in place suitable safety measures to support workers experiencing or reporting discrimination, gender-based violence or harassment, and those involved in investigations as witnesses or participants. These measures will be determined in consultation with the affected party/parties.” <i>[Insert examples of safety measures, such as paid leave, office relocation, or change in line management.]</i></p>
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Provision of appropriate additional support	<p>“The company will provide access to support resources for workers affected by discrimination and gender-based violence and harassment, offering referrals to specialised services, such as <i>[list local support services]</i>, should the complainant require medical, psychosocial or legal support services. The company will honour survivors’ preferences regarding safety and support measures, including respecting their decision if they choose not to utilise any support services.”</p>
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### Raising awareness, monitoring and review

Awareness raising and training on reporting channels and grievance procedures	<p>“The company seeks to ensure that all staff members and contractors are aware of reporting channels and grievance procedures for complaints relating to discrimination and gender-based violence and harassment. Information is provided to all workers at the time of hiring and as part of regular training sessions on company policies. Detailed information on reporting channels and grievance procedures is accessible through <i>[state reference to company intranet or noticeboard]</i>.”</p>
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Documenting, monitoring and reviewing	<p>“The company is committed to continuously improving the effectiveness and relevance of its grievance procedures for all workers through monitoring and regular review of grievance complaints to identify areas for improvement.”</p>
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## Key components and sample policy provisions – communities

Reporting channels	
Key component	Sample text
Commitment to providing a safe and inclusive avenue for addressing sensitive grievances	"The company actively encourages and supports the reporting of all incidents of discrimination and gender-based violence and harassment associated with its operations."
Multiple, easily accessible reporting channels	"Grievances may be reported to <i>[outline diverse and culturally appropriate reporting channels, providing the contact details of staff members, ideally including female members of staff, responsible for receiving grievances]</i> ."
Provision of anonymous channels	"Community members or others affected by our operations who wish to submit complaints anonymously may do so through <i>[state anonymous reporting channel]</i> ." "The company will address all anonymous reports; however, anonymity may limit the company's ability to initiate a formal investigation and/or enforce disciplinary measures against alleged perpetrators."
Confidentiality	
Commitment to confidentiality	"The company is committed to maintaining confidentiality when handling grievances raised under this procedure."
Description of measures to protect confidentiality	"Information concerning reports of discrimination and gender-based violence and harassment will be disseminated on a 'need-to-know' basis only, to as few individuals as possible and only subject to the consent of the complainant. For example, <i>[provide appropriate examples of confidentiality principles in handling of reports in clear and accessible language]</i> ." "All paper and electronic information is stored in secure locations subject to strict data management protocols."
Link failure to maintain confidentiality to disciplinary consequences	"Any violations of confidentiality requirements by company staff handling community grievances will result in disciplinary action."
Response to reports	
Commitment to a survivor-centred approach	"When addressing and investigating reports of discrimination and gender-based violence and harassment, the company will honour the preferences of survivors, including whether they wish to involve the authorities, and the subsequent steps they would like to be taken."
Clear gender-responsive investigation procedures	"The company is committed to ensuring that investigations relating to discrimination and gender-based violence and harassment are conducted promptly, impartially and by individuals with expertise in handling sensitive matters." "The company is committed to a transparent process for community members to express their concerns and file grievances, including anonymous complaints. Management will treat grievances seriously and take prompt and appropriate action. Grievances will be handled in accordance with company protocols for investigation: <i>[outline company procedures, the responsibilities of specific staff and expected timelines for receipt and acknowledgement of complaints]</i> ."
Additional training for staff involved in the management of sensitive grievances	"The company provides additional training for all staff responsible for receiving and managing community grievances relating to discrimination and gender-based violence and harassment: <i>[outline additional training provided and, where applicable, outline safeguarding training]</i> ."

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## Support and safety measures

Clear prohibition of retaliation	"The company is committed to ensuring that local community members, their representatives and other external stakeholders feel secure and protected from any form of retaliation or discrimination for reporting concerns. Forms of retaliation might include <i>[give examples of prohibited retaliatory behaviour relevant to the community, such as slander, harassment and vandalism of property.]</i> Retaliation or discrimination against individuals who report grievances or participate in investigations are strictly prohibited and condemned in the strongest terms. Where company staff participate in retaliation, this will result in disciplinary action."
Safety measures for individuals involved in the grievance process	"The company will put in place suitable safety measures to support community members experiencing or reporting discrimination and gender-based violence and harassment, and those involved in investigations as witnesses or participants. These measures will be determined in consultation with the affected party/parties. Procedures will include specific safety and safeguarding measures for vulnerable or marginalised groups." "The company will put in place specific safeguarding measures relating to children."
Provision of appropriate additional support	"The company will provide access to support resources for community members affected by discrimination and gender-based violence and harassment, offering referrals to specialised services such as <i>[list local support services]</i> , should the complainant require medical, psychosocial or legal support services. The company will honour survivors' preferences regarding safety and support measures, including respecting their decision if they choose not to utilise any support services."

## Raising awareness, monitoring and review

Awareness raising and training on reporting channels and grievance procedures	"The company seeks to ensure that all local community members are aware of reporting channels and grievance procedures for complaints relating to discrimination and gender-based violence and harassment. Information is provided in an accessible and appropriate format throughout the timeline of the company's operations in the community via community consultations and other channels. Detailed information on reporting channels and grievance procedures is accessible through <i>[state reference to company intranet or noticeboard]</i> ."
Documenting, monitoring and reviewing	"The company is committed to continuously improving the effectiveness and relevance of its grievance procedures through monitoring and regular review of grievance complaints to identify areas for improvement. This includes monitoring against indicators such as <i>[include relevant examples of indicators monitored, such as number of complaints closed, percentage of men or women aware of the grievance mechanism in community meetings]</i> ."

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## Tool 8 – Key components of a non-discrimination policy

### Objectives

As well as being a breach of individual rights, employment discrimination (on the basis of gender or any other protected characteristic) is not good business practice. It prevents all workers from making their greatest possible contribution to the workplace and impedes the creation of a harmonious, motivated and productive working environment. In broader terms, employment discrimination generates gender inequalities that undermine social cohesion and slow poverty reduction. As a minimum, clients should adopt clear and transparent policies that encourage workplace decision-making on the basis of personal merit rather than personal characteristics, such as gender.

### Establishing a non-discrimination policy

As a first step, clients may choose to **develop a standalone non-discrimination policy** to provide a clear, focused document that explicitly outlines their commitment to non-discrimination in all aspects of employment. Alternatively, clients may opt to **incorporate relevant provisions into their existing policies** (such as recruitment and performance management policies or a worker handbook) to diffuse principles of gender equality throughout the organisation's operations.

### Key components and sample policy provisions

Whether a client chooses to develop a standalone non-discrimination policy or incorporate relevant provisions into their existing policies, in light of the above guidance, the **key components and sample policy provisions** outlined below are applicable in both cases.

Introduction and scope	
Key component	Sample text
Clear commitment to equal opportunity in employment and non-discrimination	"The company is committed to providing equal employment opportunities at work. The company strives to create a workplace free from discrimination and to foster a diverse, safe and respectful working environment for all."
Scope	"This policy applies to all aspects of employment, including, but not limited to, recruitment, working terms and conditions, wages and benefits, promotion, access to training and termination of employment."  "The policy applies to all workers, regardless of their employment status, including members of staff, temporary contractors, agency workers, job candidates and interns."
List of protected characteristics	"The company prohibits discrimination based on personal characteristics unrelated to inherent job requirements, including race, colour, religion, sex, national origin, age, disability, sexual orientation and gender identity."
Recruitment and professional development	
	"The company is dedicated to fair and unbiased recruitment and hiring processes. Decisions relating to employment are based on qualifications, skills and merit – irrespective of gender or any other protected characteristic."  "In this endeavour, the company will provide clear job descriptions for every job and, where possible, advertise them publicly to as wide a group as possible. Job descriptions, advertisements or application forms will not refer to discriminatory requirements, such as age, gender, race, ethnic origin or any other protected characteristic (except in the very rare circumstances where this is a genuine requirement for the job, or where legal exceptions apply). Steps will be taken to make job applications accessible to all applicants,

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to encourage both male and female candidates, including those from significantly underrepresented groups.”

“Interviewers will not ask questions of a personal nature – for example, about marital status, family responsibilities, pregnancy (except in the very rare circumstances that there is a genuine health and safety need or risk involved that is closely linked to the requirements of the job, such as exposure to hazardous chemicals) or sexual orientation (and pregnancy testing is not part of the recruitment process). Selection for the job will be made on the basis of clear, pre-determined, objective criteria regarding what is necessary for the job in terms of experience and skill. The company will provide appropriate training to staff who are carrying out recruitment to adopt common standards.”

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Equal access to training and development opportunities	“The company provides equal access to training and development opportunities, ensuring that all employees have the chance to enhance their skills and grow within the organisation – irrespective of gender or any other protected characteristic.”
Commitment to equality in pay	“The company is committed to providing equal pay for work of equal value, irrespective of gender or any other protected characteristic. In other words, rates of remuneration (including the basic wage and any additional cash or non-cash benefits) are based on the employee’s skills, experience, responsibilities and other objective, non-gender-related factors.”
Workplace adaptations	“The company is committed to making necessary and reasonable adaptations to the workplace to accommodate specific groups of workers, including pregnant and nursing workers.”
Collective dismissals	“The procedure and criteria applied during any collective dismissal process will be objective and transparent and should not disadvantage one group over another.”

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### Gender-based violence and harassment

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Prohibition of gender-based violence and harassment	“The company is committed to maintaining a safe and respectful work environment for all. All forms of gender-based violence and harassment are strictly prohibited. The company will monitor the workplace for any form of harassment and, where it is found, act quickly to address it.”
Definition and examples of unacceptable behaviour	<p>“Gender-based violence and harassment is any harmful act or conduct committed against an individual because of their gender, including sexual, physical, psychological and economic abuse.”</p> <p>“Sexual harassment is a form of gender-based violence and harassment. It refers to any unwanted verbal, non-verbal or physical conduct of a sexual nature.”</p> <p>“Examples of behaviour that constitutes gender-based violence and harassment include:</p> <ul style="list-style-type: none"><li>• sexual comments or jokes</li><li>• displaying sexually graphic pictures, posters or photos</li><li>• unwelcome hugging or touching</li><li>• propositions and sexual advances, including offering financial or employment benefits in return for sexual favours</li><li>• physical abuse.”</li></ul> <p><i>[Companies should include examples that are particularly relevant to their operations.]</i></p>
Support	“The company will provide access to support resources for individuals affected by discrimination and gender-based violence and harassment, offering referrals to specialised services such as <i>[list local support services]</i> , should the complainant require medical, psychosocial or legal support services. The company will honour survivors’ preferences regarding safety and support measures, including respecting their decision if they choose not to utilise any support services.”

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## Reporting violations and company response

Procedures for reporting discrimination, gender-based violence and harassment, and retaliation	<p>“Employees are encouraged to report any incidents of discrimination, gender-based violence and harassment, or retaliation.”</p> <p>“Reports can be made to [<i>designated contact person/department, or link to document that outlines reporting procedures</i>].”</p>
Commitment to investigate reports and description of how violations will be addressed	<p>“The company will conduct prompt and thorough investigations into reported incidents. Appropriate action will be taken to address and resolve any violations of this policy.”</p> <p>“Confidentiality is protected for employees who lodge a grievance, particularly where the grievance relates to gender-based violence, including sexual harassment. The company will ensure that workers who lodge grievances relating to discrimination or gender-based violence are protected from victimisation or other negative consequences.”</p> <p>[<i>Companies should include references to other relevant policies (such as grievance procedures – see Tool 6), as appropriate.</i>]</p>
Sanctions for violation of the policy	<p>“Violations of this policy may result in disciplinary action in line with company disciplinary procedures, up to termination of employment. Sanctions for violation of this policy include: [<i>possible sanctions</i>].”</p> <p>[<i>Companies should provide clear links to company disciplinary procedures and other relevant policies, as appropriate.</i>]</p>

## Expectations and responsibilities

Commitment to compliance with relevant legislation	<p>“The company is committed to complying with all national legislation related to equal employment opportunities and non-discrimination, including [<i>applicable legal framework and key obligations arising from it</i>].”</p>
Behaviour expected of all staff	<p>“All company employees share the responsibility for promoting and maintaining an inclusive workplace. To this end, all staff are expected to:</p> <ul style="list-style-type: none"><li>• familiarise themselves with the provisions of this policy and relevant policies and procedures linked to this policy</li><li>• abide by company policies</li><li>• participate in training on company policies.”</li></ul> <p>“This policy and all others related to promoting non-discrimination on the basis of gender (and any other protected characteristics) will be clearly communicated and accessible to all management, supervisors and workers. All workers are required to participate in non-discrimination and GBVH training provided by the company, which is included in inductions. Managers and supervisors are trained in how to apply the policies consistently.”</p>
Named senior manager responsible for policy	<p>“[<i>Designated senior manager</i>] is responsible for the implementation of and compliance with this policy at the company.”</p>

## Tool 9 – Additional resources by sector and topic

Organisation(s)	Document	Date	Topic
<b>Agribusiness</b>			
CGIAR, Gennovate	<i>Gender in Agricultural Mechanization: Key Guiding Questions</i>	2017	Stakeholder engagement
Food and Agriculture Organization of the United Nations (FAO)	<i>The Gender-Responsive Business Model Canvas: A Tool to Assess Agricultural Service Provision from a Gender Perspective</i>	2023	Baseline
International Livestock Research Institute, CGIAR, WELI	Women's Empowerment in Livestock Index (WELI) (website)		Impact assessment, outcome assessment
	<a href="https://agrilinks.org/sites/default/files/media/file/AWE-CO4-GBV-in-Ag-Toolkit-Final-508.pdf">https://agrilinks.org/sites/default/files/media/file/AWE-CO4-GBV-in-Ag-Toolkit-Final-508.pdf</a>		
World Bank Group	<i>Integrating Gender in Land Projects: A Toolkit</i>	2022	Risk assessment, mitigants, resettlement planning
Roundtable on Sustainable Palm Oil (RSPO)	<i>Practical Guidance on Gender Inclusion and Compliance to the 2018 RSPO Principles and Criteria and the 2019 Independent Smallholder Standard</i>	2021	Due diligence
<b>Water, wastewater and solid waste services</b>			
Climate Resilient Infrastructure Development Facility (CRIDF)	<i>GESI Tools and Guidelines Update</i>	2016	Due diligence
World Vision	<i>Integrating Gender Equality and Social Inclusion in Water, Sanitation and Hygiene, GESI and WASH – A Reference Guide</i>	2023	Gender inclusion
International Finance Corporation (IFC)	<i>Integrating Gender into Water and Sanitation Projects</i>	2019	Due diligence
<b>Energy</b>			
Asian Development Bank	<i>Gender Tool Kit: Energy Going Beyond the Meter</i>	2012	Due diligence
Oxfam Australia	<i>Balancing the Scales: Using Gender Impact Assessment in Hydropower Projects</i>	2019	Impact assessment
Women Engage for a Common Future (WECF)	<i>Capacity Building Program for Women Empowerment in RHC Sector</i>	2023	Training and awareness raising
Women Engage for a Common Future (WECF)	<i>Women's Empowerment in the Energy Sector: Manual with Concepts, Ideas, Projects and Initiatives for Decentralised, Renewable and Gender-Just Solutions</i>	2022	Due diligence
International Finance Corporation (IFC)	<i>Integrating Gender in Power Operations</i>	2019	Due diligence

Organisation(s)	Document	Date	Topic
Women's Empowerment Principles (WEPs)	<a href="#">Gender Equality in the Renewable Energy Industry: Call to Action</a>	2021	Due diligence
Transport			
Gender Equality Toolkit in Transport (GET IT)	<a href="#">Gender Equality Toolkit in Transport</a> (website)		Gender analysis and mitigants
International Transport Forum (ITF)	<a href="#">ITF Gender Analysis Toolkit for Transport Policies</a> (website)		Gender analysis
Sustainable Mobility for All (SuM4All)	<a href="#">Gender Imbalance in the Transport Sector: A Toolkit for Change</a>	2023	Due diligence
World Bank Group	<a href="#">Integrating Gender Considerations into Public Transport Policies and Operations: Promising Practices</a>	2022	Good practices
International Finance Corporation (IFC)	<a href="#">Integrating Gender in Transport Operations</a>	2019	Due diligence
Asian Development Bank (ADB)	<a href="#">Gender Tool Kit: Transport</a>	2013	Due diligence
World Bank	<a href="#">Closing Gender Gaps in Transport</a>	2024	Mitigation
UITP	<a href="#">Gender Best Practices in Public Transport</a>	2024	Good practices
Large infrastructure (including non-urban transport)			
International Finance Corporation (IFC)	<a href="#">Engineering Inclusivity: Infrastructure for Everyone</a> (web page)	2023	Intersectionality, gender analysis
African Development Bank	<a href="#">Checklist for Gender Mainstreaming in the Infrastructure Sector</a>	2009	Due diligence
International Finance Corporation (IFC)	<a href="#">Pursuing Gender Equality Through Infrastructure and Natural Resources</a>	2020	Due diligence
ICT/Digital Economy			
World Bank Group	<a href="#">Closing Gender Gaps in Digital Development: A Practical Guide for Operational Teams</a>	2023	Mitigation
UN Women	<a href="#">Gender Analysis in Technical Areas: Digital Inclusion</a>	2022	Gender analysis
Manufacturing			
British International Investment (BII)	<a href="#">Sector Profiles: Manufacturing</a> (web page)		Due diligence
United Nations Industrial Development Organization (UNIDO)	<a href="#">EquiP Tool 6 – Gender equality in Manufacturing</a>	2024	Due diligence
Government of Queensland (Australia)	<a href="#">Women in Manufacturing Strategy: Diversity, Equity and Inclusion Toolkit</a>	2023	Gender inclusion
Financial institutions			
UN Women	<a href="#">Gender Analysis in Technical Areas: Climate and Disaster Risk Finance and Insurance</a>	2022	Climate and disaster risk
British International Investment (BII)	<a href="#">Sector Profiles: Financial Institutions</a> (web page)		Due diligence

Organisation(s)	Document	Date	Topic
German Federal Ministry for Economic Cooperation and Development (BMZ)	<i>Promoting Women's Financial Inclusion: A Toolkit</i>	2013	Mitigation
Hotels and tourism			
International Finance Corporation (IFC)	<i>Addressing Gender-Based Violence and Harassment (GBVH) in the Hotels, Catering and Tourism (HCT) Sector</i>	2020	GBVH
United Nations World Tourism Organization (UNWTO)	<i>Gender Mainstreaming Guidelines for the Public Sector in Tourism</i>	2022	Gender mainstreaming

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