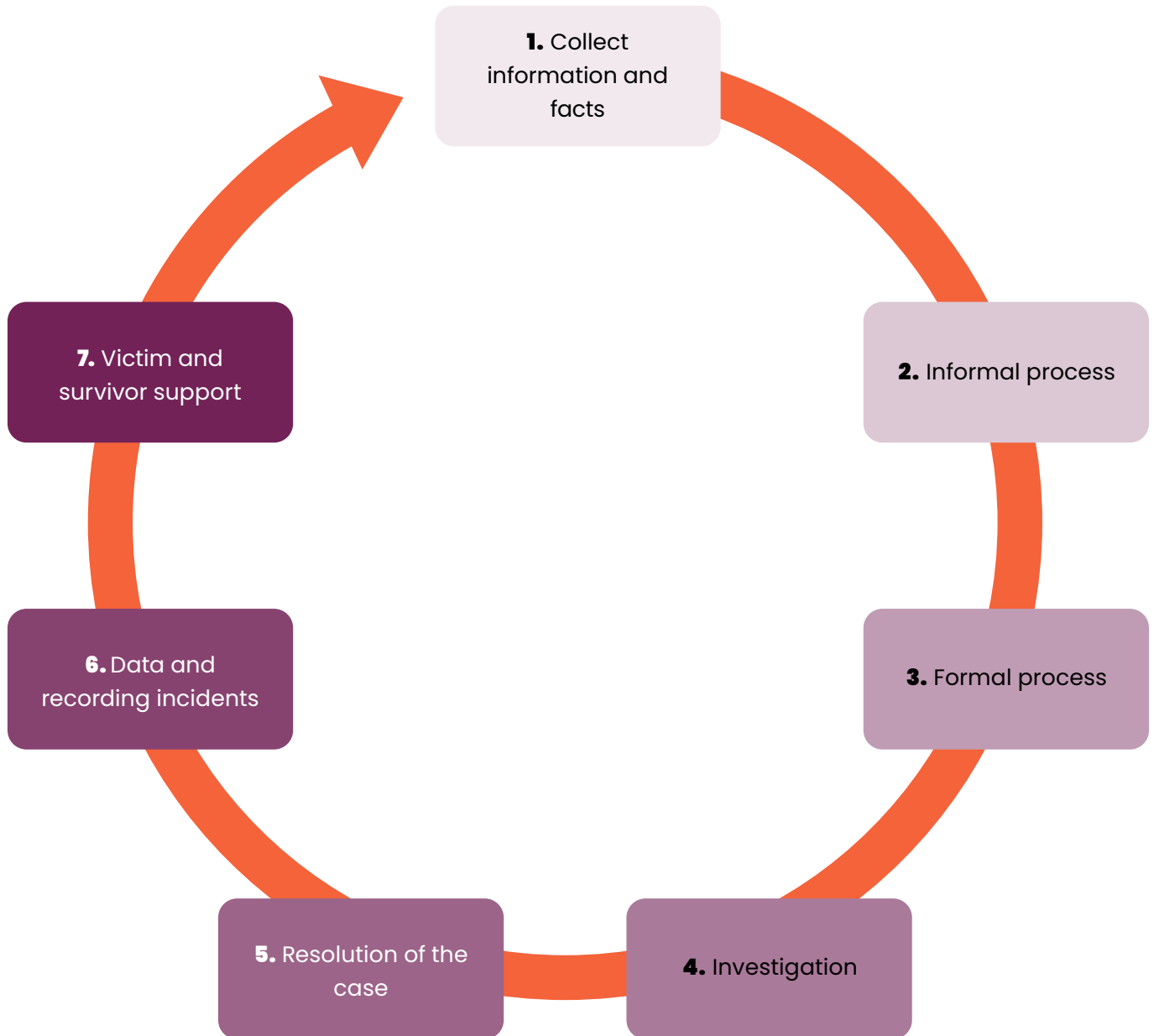


## Stages involved in handling cases of GBVH



## Stage 1: Collect information and facts and assess the severity of the complaint

- ▶ The nominated person will collect the facts of the case in a confidential and non-judgmental way.
- ▶ Ask the complainant to describe in their own words what happened. Support them in giving a detailed chronology of what occurred. Be aware that the accuracy may be compromised if the complainant is stressed or upset.
- ▶ Provide assurances that the complaint will be handled confidentially and sensitively.
- ▶ Identify any witnesses, as well as co-workers or a union representative who witnessed the impact of GBVH on the victim/survivor.
- ▶ A separate meeting will be held with the alleged harasser, at which stage they will be informed that a complaint has been made against them. They are allowed to respond to the facts of the case; there may be denial, or they may have regret and admit to the conduct.
- ▶ Inform all relevant parties (complainant and alleged harasser) about the processes involved in handling and resolving complaints, and what they should expect.
- ▶ All information discussed and agreed upon, including anything in writing, is confidential.
- ▶ It is important to inform the complainant that they have the right to withdraw their complaint at any stage in the complaints handling process. If a complainant decides to withdraw, the supplier should consult with the brand to decide if it is necessary to conduct an investigation to assess risks<sup>8</sup> and, if so, take appropriate preventive action. It is essential to check that a victim/survivor is not withdrawing a complaint because they have experienced retaliation or further harassment.
- ▶ These procedures can include GBVH from third-parties, although specific sanctions against third-party harassers will need to be explored that are proportionate to the severity of the case e.g. terminating a contract with a third-party contractor, reporting cases of harassment during travel to work to the police, while support for victims/survivors should be provided.

### Assessing the severity of the complaint:

- ▶ The severity of the complaint will need to be assessed, and an appropriate course of action taken.
- ▶ In cases of low severity, it may be possible to find a quick informal resolution. In these cases, it is essential to learn from the case and ensure a commitment to engaging in behaviour change. A record is kept of the incident. However, incidents of verbal harassment may mask more systemic problems that require further investigation.
- ▶ In cases of high severity, for example, where there has been repeated GBVH and/or where sexual assault has occurred, a formal process should be started immediately, and an immediate system of support is put in place to protect the victim or survivor. Victims and survivors should be supported to report to the police and/or through the criminal justice system.

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<sup>8</sup> For instance, a business could frame an investigation as a routine monitoring and evaluation activity to assess how well the risk of GBVH is being identified and mitigated to maintain the confidentiality/anonymity of the person reporting.

## Stage 2: Informal procedure

- ▶ An informal procedure may be possible following an informal discussion with the alleged harasser, which could result in them becoming aware of the problem and issuing an apology, accompanied by a commitment to changing their behaviour.
- ▶ The complainant is consulted about whether they wish the matter to be resolved informally or prefer formal disciplinary action to be taken.
- ▶ If necessary, and if there are no witnesses or evidence to draw on, one option will be to institute wider consultations within the organisation to identify if there is a systemic problem. This could involve focus group discussions, a safety walk with women, or a survey to determine if a systemic issue exists.
- ▶ An informal procedure can result in a victim/survivor-centred meeting where an apology is issued. In GBVH cases, a mediator can be appointed, but this should only be held if there are no power imbalances and with the victim's consent. Restorative justice is another method that can be used, but this should only be implemented by trained external restorative justice professionals.
- ▶ Aim for early resolution within a realistic timeframe and provide support to the complainant.
- ▶ The complainant may also give their consent for their manager/union representative to speak to the alleged harasser on their behalf.

## Stage 3: Formal procedure

- ▶ The formal procedure is a more complicated and lengthy process that requires the establishment of an anti-GBVH Committee, if one does not already exist, and an external investigation.
- ▶ The formal procedure should be completed within two months or within an agreed timeframe.
- ▶ Initially, the supplier should address the complaint directly. However, the brand will be responsible for instituting the formal process if the supplier does not have a policy or a complaints mechanism in place. The complainant may lack trust in the process or the capacity, or may be influenced by power inequalities between the complainant and the alleged harasser.
- ▶ Confidentiality must be guaranteed, and at no stage should information about the source of the complaint be disclosed to the alleged harasser.
- ▶ Where relevant, work tasks or the work location of the alleged perpetrator may be reassigned, or the individual may be temporarily suspended from work during the handling of a complaint and investigation.





## The role of the anti-GBVH Committee

- ▶ An anti-GBVH Committee may already be in place; if not, it will be established to handle the complaint, including the investigation of the complaint.
- ▶ The majority of members of the anti-GBVH Committee will be women, and there should be representation from workers and unions, as well as at least two external gender experts/lawyers.
- ▶ A clear remit is given to the anti-GBVH Committee with terms of reference setting out the role and responsibility to handle complaints and investigations fairly and confidentially, as well as timeframes for resolving complaints at each stage of the complaint-handling process.
- ▶ The Committee will be tasked with making recommendations on ways to change the culture and prevent similar cases of GBVH arising in an organisation.
- ▶ Ensure that committee members receive training, briefings, and guidance on the process for handling complaints and implementing gender-responsive solutions.
- ▶ Document all decisions, including confidential minutes of all meetings.
- ▶ Where a complaint is upheld, the anti-GBVH Committee will be responsible for deciding the sanctions to be issued. This could range from an apology to the victim or survivor and a commitment to behavioural change to more serious sanctions, such as termination of employment.

## Stage 4: Investigations

- ▶ An investigation should be initiated as soon as possible, and no later than 10 days after the complainant has signed the statement.
- ▶ Investigations can be carried out internally or carried out by an external gender expert. External investigations are recommended if there are potential conflicts of interest or if cases are serious.
- ▶ If an internal investigation is conducted, ensure that the Committee has the capacity to conduct this fairly.
- ▶ Ensure that investigators are fully equipped to investigate the sensitive issue of GBVH.
- ▶ Maintain a list of trained investigators at the national level, such as those identified through women lawyers' networks.
- ▶ Ensure that the investigative process will be carried out within a reasonable timeframe and completed within one month. Information is provided to all concerned parties regarding the duration of the investigation.
- ▶ Maintain confidentiality throughout the investigation and share relevant information with the complainant to ensure their consent to information sharing, including details about when and with whom the information will be shared.
- ▶ Specific measures should be implemented to ensure that victims and survivors are supported throughout the process and that perpetrators are held accountable.

## Stage 5: Resolution of the case

- ▶ If the victim's or survivor's complaint is upheld, implement a range of possible actions/sanctions and ensure that they are carried out. A meeting is held with the perpetrator so that they are fully aware that it is an offence to perpetrate GBVH.
- ▶ Complainants and alleged harassers have the right to appeal.
- ▶ Conduct a review of the case with all relevant parties and identify lessons learned from how it was handled. The goal is to learn from the experience and improve the process rather than assign blame. This review should also identify other measures that need to be implemented, such as training, information dissemination, workplace policy implementation, and risk assessment, to prevent the recurrence of GBVH.

## Stage 6: Data collection, monitoring and review

- ▶ Collecting data, monitoring, and review are an essential part of the complaints handling process.
- ▶ Anonymised, gender-disaggregated data should be collected about the incident and how it was resolved.
- ▶ The data will be reviewed regularly to identify any patterns or increases in cases (an increase in cases should be viewed as a positive outcome as this indicates victims/survivors feel able to make reports).
- ▶ Record any learning from the complaint and how it was resolved.
- ▶ Review the complaints record regularly to identify any patterns/clusters/ issues of concern.
- ▶ Recording complaints and their resolution is important to monitoring trends. Disaggregated data is crucial for this (see template below, which can be adapted to brands/suppliers reporting and monitoring systems).
- ▶ Brands can establish a dashboard to track and monitor complaints, enabling it to be included in brands' management accountability and reporting systems.

## Stage 7: Victim and survivor support

- ▶ Victims and survivors receive support throughout the complaints handling process, both during and after the process. Ensure regular information, confidentiality and privacy at all stages of the process.
- ▶ Allow for time off for recovery, including paid leave and adjustments to work schedules, work tasks or work location, and if necessary the provision of shorter/flexible working hours and/or paid leave, will be offered to enable a worker to recover from the effects of GBVH.
- ▶ A system is in place for referrals to support services, including counselling, legal, medical, and/or social support. An up-to-date list of local and national victim/survivor support services is held.
- ▶ Ensure non-judgmental and empathetic communications when a victim or survivor discloses or reports a case of GBVH.



## Case study: The Dindigul Agreement

The Dindigul Agreement is a unique and pioneering legally binding agreement that was introduced in response to a serious case of sexual harassment that led to the alleged rape and murder of a 20-year-old Dalit garment worker. The agreement was signed in 2022 and is a pioneering, binding, and worker-centred multi-stakeholder agreement between Eastman Exports, the Tamil Nadu Textile and Common Labour Union (TTCU), and labour rights organisations (Asia Floor Wage Alliance and Global Labor Justice), and supported by global brands such as H&M Group, Gap Inc. and PVH Corp. Aligned with ILO Convention No. 190, the Agreement aims to eliminate GBVH at Eastman's Natchi Apparel Factory and Spinning Mills. Key features of the agreement include the establishment of a worker-centred complaints mechanism, comprehensive training for more than 2,000 workers and managers, and the deployment of trained shop-floor monitors to support workers and identify GBVH risks.

In addition to the reviews conducted in 2022 and 2023, a 2024 end-of-term evaluation of the Dindigul Agreement (DA) was published in 2025.<sup>9</sup> The 2025 report concluded that the DA represents a unique example of the practical implementation of ILO Convention No. 190 and the right to Freedom of Association (FOA), with the DA's overwhelming success reported across multiple indicators:

- ▶ Training for workers and managers has increased awareness of GBVH and worker rights.
- ▶ Workers have access to trained counsellors, internal complaints committees (ICCs), and worker shop-floor monitors (SFMs).
- ▶ Grievance reporting has increased significantly, including on GBVH, reflecting higher trust and accessibility, rather than rising incidence.
- ▶ GBVH complaints are resolved rapidly, often within days, which is attributed to strong labour-management collaboration.
- ▶ FOA and union presence (TTCU) have been decisive in making grievance mechanisms safe and credible.
- ▶ Workers report improved safety, dignity, and empowerment; management reports reduced conflict and risk.
- ▶ The DA contributed to transforming workplace culture and reducing harmful practices such as harassment, "moral policing," and fear-based silence.

Continued

<sup>9</sup> S Kuruvilla, The Dindigul Agreement to End Gender-based Violence and Harassment: Has it worked? (ILR Global Labor Institute, 2 Nov 2025). Available from: <https://www.ilr.cornell.edu/sites/default/files-d8/2025-11/gli-dindigul-nov2025-final3.pdf> [accessed 18 Nov 2025]

## Case study: The Dindigul Agreement (continued)

Despite these gains, brands did not increase sourcing, partly because contract language did not require it and because broader sourcing strategies remain driven by price and supply chain consolidation.

The success of the programme is largely due to localised factors, including a women-led, community-rooted union (TTCU) that is trusted by workers and effective labour-management collaboration. Furthermore, the implementation of multi-channel grievance channels (SFMs, ICCs, union, counsellors) and the establishment of accountability through the Oversight Committee are critical success factors. The integration of workplace and community issues is another important factor, recognising the links between GBVH at work and at home. Workers describe significant improvements in safety, dignity, and confidence, while management benefits from reduced conflict and business risk.

Stakeholders believe the model and principles are highly replicable where there is local trust, strong unions, trauma-based triggers (a tragedy or traumatic event that leads to industry collaborative action), and management willingness. Replication attempts in Tirupur and the Central Java Agreement show promise, especially when unions are engaged early, internal committees are strengthened, and preventive approaches are emphasised. Replication can be lower cost when training and core institutions are adapted rather than recreated.

Scaling is possible but challenging. Overall, other factories in Dindigul could adopt similar approaches because of TTCU's presence, while scaling across Eastman's other factories or the Tirupur cluster is harder due to perceptions and fears that agreements signal "problems". National or international scaling faces additional obstacles such as low or fragmented union presence, brand reluctance, and the absence of sector-level bargaining structures. While not yet scaled, the DA offers a powerful blueprint for rights-based, worker-centred models capable of eliminating GBVH in the workplace.